DOE/EIS - 0091 -F



**Final Environmental Impact Statement** 

## BONNEVILLE POWER ADMINISTRATION



# GARRISON-SPOKANE 500-kV TRANSMISSION PROJECT

**U.S. Department of Energy** 



March 1983



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**U.S. Department of Energy** 



Responsible Official: WILLIAM A. VAUGHAN Assistant Secretary for Environmental Protection, Safety, and Emergency Preparedness



# **Table of Contents**

#### GARRISON-SPOKANE 500-kV TRANSMISSION PROJECT

#### Table of Contents

#### VOLUME II

|      | Table of Contentsi<br>List of Figuresiii<br>List of Tablesiii  |
|------|--|
| I.   | IntroductionI-l  |
| II.  | Subjects of Controversy. II-1<br>A. Need for the Line (and the Power). II-1<br>B. Other Alternatives. II-6<br>1. Other Route Alternatives. II-6<br>2. Alternatives to Building. II-9<br>C. Corridor Development/Future Planning. II-12<br>D. Legal Concerns. II-16<br>1. National Environmental Policy Act (NEPA)/"Segmentation". II-16<br>2. Compliance with Other State and Federal Facility<br>Siting and Planning Acts. II-19<br>3. Flathead Indian Reservation Right-of-Way. II-23<br>E. Who Pays/Who Benefits. II-24 |
|      | F. Why BPA is Building This Part of the Line   |
| III. | Resource Concerns.III-1A. Urban/Residental.III-1B. Forestry.III-4C. Agriculture.III-7D. Recreation.III-1E. Air Quality.III-1F. Water Resources.III-1G. Soils/Geology.III-1H. Cultural Resources.III-1I. Social and Economic Concerns.III-2   |

#### Table of Contents

|     | J.<br>K.<br>L.   | EstheticsIII-33<br>WildlifeIII-36<br>VegetationIII-40 |
|-----|--|---|
| IV. | Geog<br>A.<br>B.<br>C.<br>D.<br>E.<br>F.<br>G.<br>H.<br>I.<br>J.<br>K.<br>L.<br>N.<br>O.<br>P.<br>Q.<br>R.<br>S.<br>T.<br>U.<br>V. | graphic Areas of Concern                              |
| v.  | Summ<br>A.<br>B.<br>C.<br>D.<br>E.<br>F.<br>G.<br>H.<br>J.<br>K.<br>L.<br>M.   | <pre>mary of Public Meetings</pre>                    |
| VI. | Com<br>A.<br>B.  | Nent Letters  |

# List of Figures

After Page

| 1. | Percent of Comments by Representation Group          | I-4 |
|----|--|-----|
|    | Percent of Comments by Place of Origin               |     |
|    | Number of Comments by Subject.                       |     |
|    | Number of Comments by Resource Concern               |     |
|    | Maxville Local Routing Alternatives                  |     |
|    | Potomac and Blue Mountain Local Routing Alternatives |     |
|    | St. Regis Local Routing Alternatives                 |     |
|    |  |     |

#### List of Tables

After Page

| 1. | Underground and Overhead Transm<br>of Potential Sources of Impacts | ssion Systems: Comparison | .II-104 |
|----|--|---------------------------|---------|
| 2. | Local Routing Alternatives: Da                                     | a Summary                 | IV-4    |

# Introduction

#### VOLUME II

#### I. INTRODUCTION

This volume of the Garrison-Spokane Evironmental Impact Statement (EIS) contains responses to all comments made on the Draft EIS (DEIS), summaries of transcripts taken at all DEIS public review meetings, and complete reprints of all written comments submitted on the DEIS. It is organized so that readers will be able to find their subject(s) of interest without difficulty. In order to distinguish easily between references to this Volume (II) and Volume I, major headings in this Volume are called <u>PARTS</u>; major headings in Volume I are called <u>CHAPTERS</u>.

#### How to Find What You Want

To make your research easy, we have divided the comments and responses into three categories. The first category, SUBJECTS OF CONTROVERSY, is covered in Part II and includes major issues raised by the public during scoping. Here the reader will find discussions on such subjects as the need for the line or the biological and electrical effects of the line or legal issues pertaining to the line.

The second category (Part III) is called RESOURCE CONCERNS, and covers all the resources which could be affected by the transmission facilities. Comments and responses on such resources as agriculture, forestry, recreation, vegetation, and so on are individually grouped for the convenience of the reader with a particular interest.

Part IV is designed for the reader most concerned about a particular place in the study area. GEOGRAPHIC AREAS OF CONCERN identifies communities and places which repeatedly emerged in the comment analysis as subjects of concern to people. Communities such as Lolo and St. Regis, as well as places such as Rock Creek and the Clark Fork River, are identified here. If a reader is interested both in a place (such as Drummond) and a resource (such as agriculture), he or she may wish tirst to read the summary of concerns expressed by the public about the Drummond area (in Part IV), and then to turn to other comments and responses in Part III, which would deal with more general agricultural concerns. Topics are frequently cross-referenced, where the study team felt that readers' interests might carry them beyond a single response.

Under each heading in Parts II - IV you will find a summary of the concerns for that topic, followed by actual comments and responses. This gives the reviewer the choice of reading an overview of the contents without having to read each individual comment.

Finally, Part V contains a lengthy summary of all the public meetings held to receive comments on the DEIS. Part VI contains complete reprints of every letter received during DEIS review. For the greatest ease in finding individual topics of interest, please consult the Table of Contents in this Volume.

Garrison-Spokane EIS Wg1702E:02-05-83

#### How the Comments Were Collected

When a draft environmental impact statement is completed and printed, it is circulated to interested members of the public and to governmental agencies. Readers are urged to review the document and the findings and to comment on both, either by letter or at public meetings.

For the Garrison-Spokane project, copies of the EIS and accompanying appendices, as well as copies of the Summary of the EIS, were distributed in March 1982. The 10-week comment period ran from March 16, 1982, to May 28, 1982. During this time, 14 open houses and 14 public meetings were held in communities throughout the study area to answer people's questions and to allow any concerned individual or agency to enter comments officially into the record. A record was kept by an official court recorder at each meeting, and transcripts were prepared for analysis by an interagency study team. (For more detail on these meetings, see Part V, MEETINGS SUMMARY, in this Volume.)

Comments in the form of letters or petitions were also received at these meetings and at the BPA Transmission Coordination Office in Missoula, as well as by various individuals at Bonneville headquarters in Portland, Oregon. Each written comment was logged and coded for reading and analysis by the interagency study team.

#### How Comments Were Identified

Deciding what is a comment is a difficult job, particularly when reading oral presentations given spontaneously. Accordingly, the study team defined comments as broadly as possible, in order to ensure that everyone who had something to say was heard:

"A comment is an observation or an expression of opinion which possesses a clear subject and which suggests, assigns a value, makes a judgment, identifies a concern, or corrects an error."

A comment, once identified, could then be coded to indicate the following information: whether it was from a letter or transcript; place of origin; whether the speaker represented himself, a company, a government agency, an interest group, or the public as a legislator; who made the comment; the area of concern; subject of concern; comment on a particular electrical plan-of-service; and, finally, a unique number for each comment.

A second concern was to make sure that the process of identifying comments and deciding what category they fell into was both fair and consistent. Eight analysts were responsible for reading and identifying comments. Every letter and transcipt went through the same process:

-Two analysts ("controls") were designated to assure consistency among the eight specialists identifying and coding comments.

-Every letter and transcipt was assigned to a pair of specialists, including one "control." Each analyst read the document independently, identified comments, and coded them for the categories mentioned above. -The pair met to discuss each individual comment and to decide on a final coding.

-Each comment was entered into a master file for later analysis.

#### How the Comments Were Analyzed and Answered

After all comments had been identified, they were sorted by subject and assigned to specialists within BPA, the US Forest Service, the Bureau of Land Management, and to other interagency team consultants for review and analysis. Each specialist sorted comments into groups and, where many comments were close to identical, wrote "summary" comments to eliminate repetitious answers in this Comment/Response Volume. Highly individual comments were retained verbatim from the transcripts or letters. Each comment then received a response.

Responses to comments vary according to the nature of the comment as stated in CEQ Regulation 40 CFR 1503.4:

"An agency preparing a final environmental impact statement shall assess and consider comments both individually and collectively, and shall respond by one or more of the means listed below, stating its response in the final statement. Possible responses are to:

(1) Modify alternatives including the proposed action.

(2) Develop and evaluate alternatives not previously given serious consideration by the agency.

(3) Supplement, improve, or modify its analyses.

(4) Make factual corrections.

(5) Explain why the comments do not warrant further agency response, citing the sources, authorities, or reasons which support the agency's position and, if appropriate, indicate those circumstances which would trigger agency reappraisal or further response."

After responding to all of the comments that could be described by categories 1-5 above, several types of comments remained. In general, these comments were simple statements that expressed an opinion but did not state reasons or did not give enough detail to provide material to respond to. For example, responses were not provided for comments such as:

"The draft EIS is in violation of the National Environmental Policy Act."

However, it was possible to respond to similar comments that provided more detail:

"The draft EIS is in violation of NEPA because it segments the project at Garrison."

Garrison-Spokane EIS Wg1702E:02-05-83

After the responses were collected by the study team, further checking for accuracy was done, and additional material added where cross-referencing was necessary. The three categories of comments were developed (SUBJECTS OF CONTROVERSY; RESOURCE CONCERNS; and GEOGRAPHIC AREAS OF CONCERN) and comment/response pairs re-sorted to their proper places within the categories. Where "no response" comments were received, they were noted and characterized under each subject heading. Final notes were made where changes in the DEIS itself would be required. The entire Comment/Response Volume then underwent an interagency review before it reached final form.

#### Characterizing the Comments

During the comment period (March 16 to May 28, 1982), 4,176 comments were identified in about 275 letters to BPA's offices in Missoula and Portland and at 14 public meetings held throughout the project area in April and May, 1982. Approximately 3,000 comments, or about 70 percent of the total, were transmitted in the form of letters. About 1,200 comments, or 30 percent of the total, were delivered orally at public meetings. These comments were then extracted from the public meeting transcripts which were prepared for each meeting.

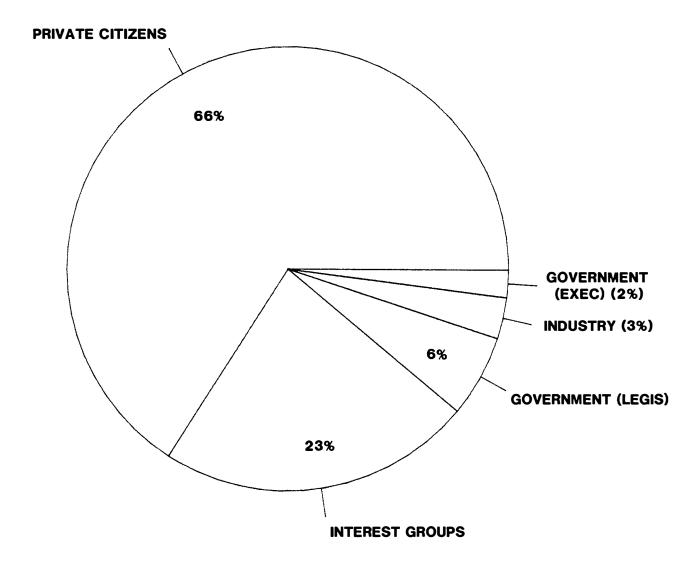
Who Spoke: As shown in figure 1\*, about 2,700 comments, or 66 percent of the total, were received from private citizens. Another 1,000 comments, or about 23 percent of the total, originated from interest groups. Legislative government representatives contributed about 250 comments, or 6 percent of the total, and representatives of industry made about 100 comments, or 3 percent of the total. The remaining 80 comments, or 2 percent of the total, came from executive government agencies.

Origin of Comments: Figure 2 presents the place of origin by county for all of the 4,176 comments. As shown, about 2,000 comments, or 47 percent of the total, originated from Missoula County. Another 800 comments, or 20 percent of the total, originated from Mineral County. About 460 comments, or 11 percent of the total, originated from Granite County residents. When an additional 170 comments, or 4 percent of the total, from other Montana counties (including Sanders, Powell, Lake, and Lewis and Clark) are added to the above totals, Montana counties accounted for about 82 percent of all comments. Idaho counties (primarily Shoshone and Kootenai) accounted for another 1 percent of all comments and Spokane County in Washington accounted for 1 percent. And finally, about 600 comments, or 15 percent of the total, originated from Washington, D.C.

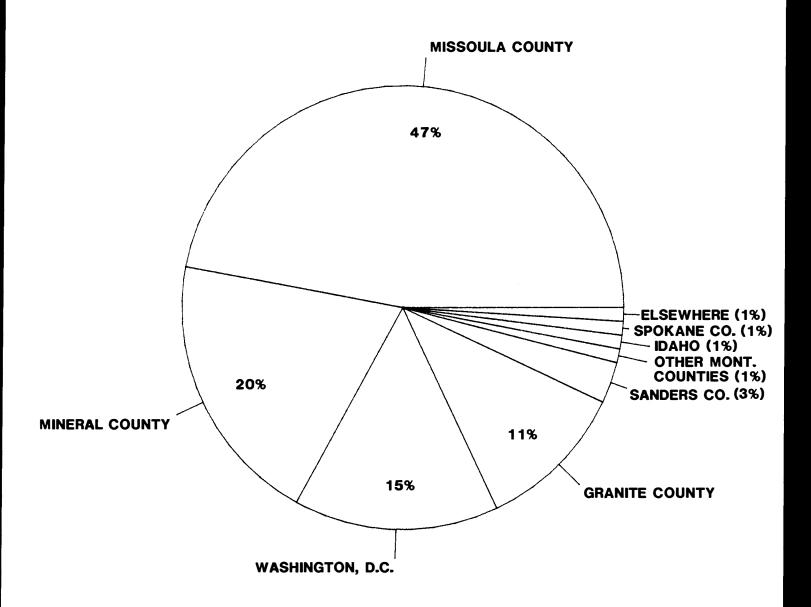
<u>Subjects of Controversy</u>: As shown in figure 3, about 375 comments addressed the issues of biological/electrical, radio/TV, and noise effects. About 360 comments posed questions or made statements about the cost of the line and another 170 comments addressed the need for the line or the power. Approximately 290 comments were made on the process and methodology used to site the line, rank alternatives, and prepare the DEIS. Another 140 comments made statements about the adequacy of the DEIS. As shown, slightly over 100

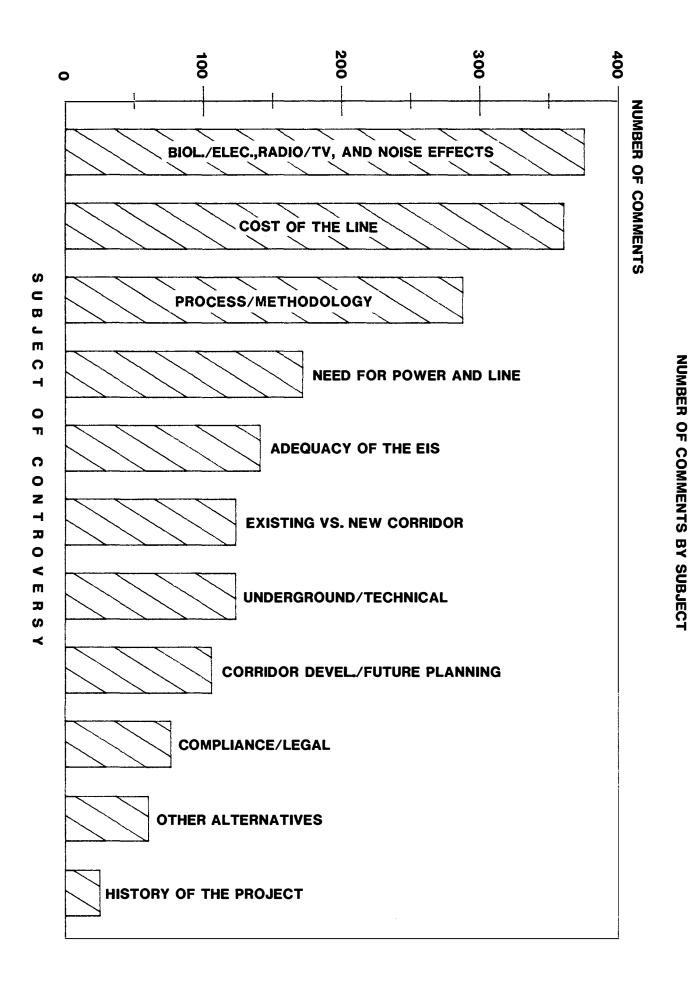
<sup>\*</sup>Note that each figure in the introduction presents different illustrative breakdowns of the same set of comments.

# GARRISON - SPOKANE PROJECT PERCENT OF COMMENTS BY REPRESENTATION GROUP



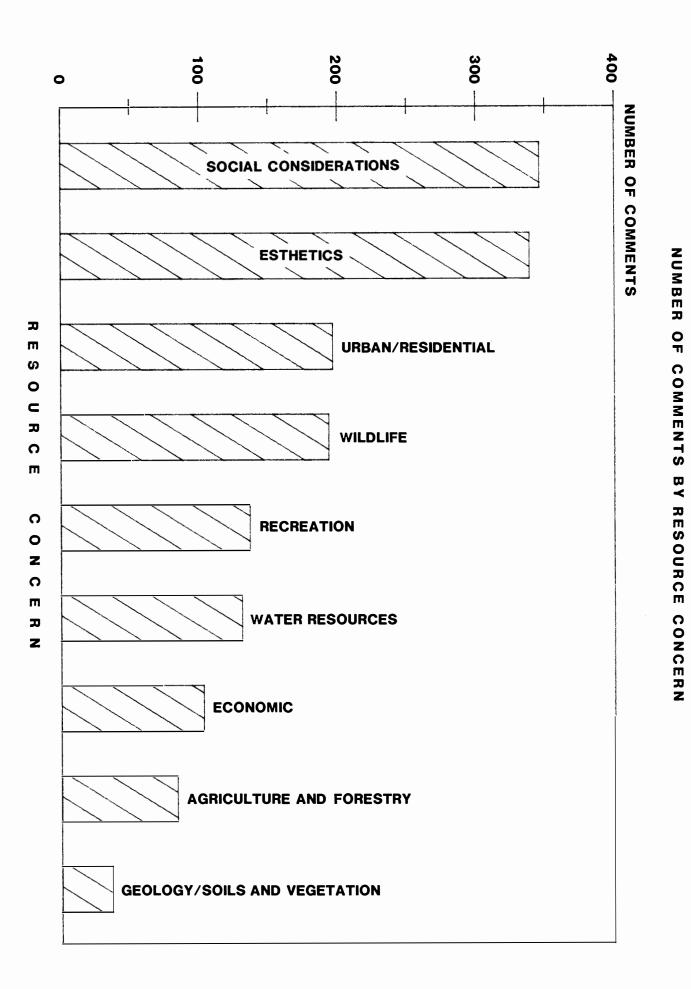
## GARRISON - SPOKANE PROJECT PERCENT OF COMMENTS BY PLACE OF ORIGIN





GARRISON - SPOKANE

PROJECT



**GARRISON - SPOKANE PROJECT** 

comments each were received on the issues of using existing or new corridors, undergrounding/technical, and corridor development and future planning. Another 70 comments addressed compliance with Federal and state regulations and other legal issues. About 60 comments focused on alternatives to building the line, and about 25 comments addressed the history of the project.

Resource Concerns: As shown in figure 4, social considerations (such as the line's effects on local qualities of life) and esthetics each received over 300 comments. Almost 200 comments each were received on the urban/residential and wildlife resource areas. About 140 comments addressed recreational issues and another 130 comments focused on water resource issues. About 100 comments pertained to economic considerations and another 80 related to agricultural or forestry issues. Finally, about 37 comments addressed soils/geology or vegetation issues.

# Subjects of Controversy

#### II. SUBJECTS OF CONTROVERSY

#### II. A. NLED FOR THE LINE (AND THE POWER)

Most of the people commenting on the need for the project and the power called for an update and reevaluation of load projections which justified Colstrip Units 3 and 4 and its associated transmission facilities. Many commentors noted that in recent years, actual demand was well below projected demand in BPA's service area. Several cited closures of industry, mines, and sawmills, and others stated that conservation and technological change were responsible for the "leveling off" of actual demand for power. Other comments expressed the view that the WPPSS shutdowns represented evidence of the Pacific Northwest's power surplus.

Many of the comments that expressed views about historical demand also addressed future demand/supply relationships. People questioned the certainty of these projections and asked questions about their sensitivity to conservation efforts, technological change, and prices. Many of these commentors felt that energy demand projections should be made by independent forecasters to avoid conflicts of interest.

Other comments on need addressed such topics as wheeling arrangements, transmission system losses, costs and benefits of the project, and the need for The Washington Water Power Company project.

In response to these comments, additional information has been prepared for Volume I, Chapter I: PURPOSE OF AND NEED FOR ACTION. This information is included to clarify further the history and relation of this project to the Colstrip project and to present current energy forecast information that illustrates how this project and the related Colstrip project fit into the regional energy outlook. Other more specific comments and responses follow.

In addition to the comments described above, several others simply made statements like "The need for this project has not been demonstrated," or "Colstrip 3 and 4 are already dinosaurs in a desert of no demand." Others simply expressed opinions like "I believe the country needs this project."

1. <u>Comment</u>: Isn't that the responsibility of BPA and the environmental statement; this section was segmented and, therefore, as the scoping comment said that the need [for line plus power] had to be addressed directly in this EIS, as I understand it. Is that correct or not?

<u>Response</u>: The needs for the project must be and are addressed in Chapter I, PURPOSE OF AND NEED FOR ACTION, of Volume I. The needs for which this project is proposed are: 1) to integrate and transmit additional electric power supplied by the Colstrip generating units (Units 1 and 2 are in service; Units 3 and 4 are licensed and under construction), and 2) to maintain the electrical reliability and stability of the Federal Columbia River Power System. The question of need for power is covered in the response to the next comment. Garrison-Spokane EIS Wg0046:02-07-83

2. <u>Comment</u>: The need for the Garrison-Spokane 500-kV Transmission Project is based on an overall needs analysis that was done for the Colstrip Project in the mid-1970's. Because of recent changes in demand and the Washington Public Power Supply System (WPPSS) shutdown of generating stations that were under construction, the mid-1970's projections are outdated and should be recalculated in order to analyze the need for the Garrison-Spokane Project.

<u>Comment</u>: Need for the project was established too long ago; it ought to be reviewed in light of present day use and demand.

<u>Response</u>: The evaluation of need for the Colstrip project [including the transmission system to connect to the Federal Columbia River Power System (FCRPS)] was done in the 1970's. The State of Montana issued a certificate of public need, the project was licensed, and it is now under construction (on schedule and overall about 60 percent complete). Although the date by which this power is needed has been postponed, the need still exists. The underlying needs for the Garrison-Spokane Project to integrate Colstrip energy and maintain electrical reliability and electrical stability of the FCRPS are still current and valid, given the status of the Colstrip project and the energy that will be brought into the regional power grid when it starts producing energy. It is not reasonable to fail to provide any means to transmit power for these plants nearing completion. For more information on the No Action alternative, see Chapter II, Volume I.

There is considerable interest in recent changes in demand for electricity and regional energy forecasts. Data has been added to Chapter I: PURPOSE OF AND NEED FOR ACTION to provide an updated picture of the Northwest's energy situation, including a table showing projected regional loads and generating resources without the now-terminated WPPSS projects 4 and 5.

3. <u>Comment</u>: In the EIS, it is stated that Montana's decision to allow construction of Colstrip Units 3 and 4 and associated transmission facilities means that the Garrison-Spokane Transmission Project must be built in spite of public opposition, reduced demand, and environmental costs.

Response: In order to meet the needs related to the energy Colstrip will provide, described in Chapter I of Volume I and discussed above, the transmission line project would have to be built. Extensive scoping throughout the study area has revealed numerous public concerns and controversies (described in Chapter I, Volume I). A variety of environmental impacts--changes from conditions now present in the project area--would also occur. A public record of decision, to be issued about a month after completion of the final EIS, will document what must be done, will identify all relevant factors considered in reaching the decision, and will delineate measures to be taken to avoid or minimize environmental harm.

4. <u>Comment:</u> . . . The justification for bringing the line through Missoula really doesn't exist.

<u>Response</u>: As stated in Volume I, Chapter I, one of the goals of the project is to "provide for potential [emphasis added] future reinforcement of

electrical service to Missoula." The Montana Power Company (MPC) has determined that additional transmission facilities may be needed in the 1990's system to serve the Missoula Valley area. Connecting with the BPA transmission system provides an opportunity to minimize the amount of future transmission facilities and associated environmental impacts in the area. Missoula area reinforcement would not actually take place now. Alternatives and their impacts would be evaluated at such time as MPC actually proposed to build facilities.

5. <u>Comment</u>: Concern was expressed about the possible effects of recent industrial closures (Bunker Hill Mine, Anaconda Mine) and recent postponement or cancellation of energy generation facilities (two of five WPPSS plants, Resource 89, and the Evans plant) on energy demand and demand projections, and consequent effects on the need for the Colstrip plants and this transmission project. The opinion was expressed that actual demand will most likely remain below projected demand, casting doubt on the need for this project.

<u>Response</u>: For many reasons, growth in power use has declined in recent years. Interactive factors such as conservation, price increase, economic recession, and the costs of financing large energy projects have influenced energy use patterns. Consequently, it is difficult to forecast precisely the generating and other energy resources needed to meet demand. (Information describing resources available or committed to serve energy demand have been added to Chapter I, Volume I. The most recent regional energy forecast is also included to update the area's energy picture.) Industrial slowdown and closures such as mentioned in the comment affect power demand and planning for future (but as yet unlicensed) energy generation resources. As of now, the Colstrip project participants still foresee need for the energy when the plants come on line.

The needs for this project, as described in Chapter I of Volume I, are to integrate the energy output of Colstrip Generating Units 3 and 4 (which are 60 percent complete and on schedule) and to maintain the electrical reliability and stability of the FCRPS. If the schedule for the Colstrip project were to change, it could affect the energization date of the Garrison-Spokane transmission line.

The role of the WPPSS nuclear power plants in the overall regional power situation is beyond the scope of this project. Two of the tive Washington Public Power Supply System nuclear generating stations (Numbers 4 and 5) were terminated and one delayed primarily because the Supply System was unable to continue further financing of their construction. Other factors, of course, were also involved, including a changing picture of energy demand. A delay of one of the three remaining nuclear generating stations under construction was necessary to reduce overall costs.

6. Comment: What degree of certainty can be attached to the load forecasts?

<u>Response</u>: An energy forecast is a tool to help energy planners predict future electricity use patterns. BPA's forecast is based on the best available current information and uses latest forecasting methods. As with Garrison-Spokane EIS Wg0046:02-07-83

any prediction, however, there is an element of uncertainty. A discussion of this uncertainty follows. While the baseline forecast represents a "best estimate" as to what the future will hold, it is unlikely to be confirmed by what actually occurs. The following table provides an assessment of the probabilities, derived through informed judgment, of four possible future outcomes.

#### Uncertainty Assessment

| Occurrence   | Probability of Occurrence |
|--|---------------------------|
| Actual loads exceed the high case                    | 15%                       |
| Actual loads fall between the baseline and high case | 40%                       |
| Actual loads fall between the baseline and low case  | 35%                       |
| Actual loads fall below the low case                 | 10%                       |

The credibility of the forecast may also be assessed by cross-comparison with other forecasts. Of forecasts developed in the region to date, the only one performed using models comparable to those used by BPA was conducted by Charles Rivers Associates conducted for the Washington State Legislature. This forecast revealed 20-year average annual rates of growth quite similar to those of BPA's forecast: 1.5 percent for the moderate (baseline) case, 2.0 for the high case, and 1.1 for the low case demand.

BPA's forecast is designed as an aid in planning, not as a final simulation of the most probable consumption of electrical energy to the year 2000. Its primary role is to assist decisionmaking until the publication of the Northwest Power Planning Council's official 20-year electrical energy forecast and plan in April 1983. Thereafter, the Northwest Power Planning Council documents will be used in the planning and acquisition of appropriate resources by BPA.

7. <u>Comment</u>: Who is responsible for forecasting energy needs? An independent study of the need for this project would be valuable in determining whether the line is justified.

<u>Response</u>: The Northwest Power Planning Council is now responsible for preparing an official 20-year electrical energy forecast and plan for the region. In the past, each utility in the Northwest has been responsible for preparing a load forecast predicting the future demand for electricity in its service area. All investor-owned utilities and many of the larger public utilities (particularly those with generation of their own) prepared their load forecasts independently. BPA assisted the smaller public utilities in preparing their load forecasts, and BPA also forecast the loads of their direct service industries using existing contractual commitments with these companies. These forecasts are then submitted to the Pacific Northwest Utilities Conference Committee (PNUCC). The PNUCC is an organization of Northwest utilities whose main function is to prepare a regional forecast of the expected power loads and resources to serve those loads. For this project, the Bonneville Power Administration is the agency of the Federal Government responsible for determining need for transmission facilities. As discussed in Volume I, the Congress of the United States reviews and approves the program and projects proposed by the Bonneville Power Administration.

8. <u>Comment</u>: The discussion [Chapter II, p. 21-22] goes on to say that if this project were not done the power transmission losses would be about \$2 million for BPA and WWP and several times that for Montana Power. A total loss of somewhere around \$60 million--but a cost to correct of about \$190 million. My conclusion is that this project really falls under the "nice to do" category and is not essential at this time and may not become so in the future depending on alternate energy sources and locations of their development. The remaining paragraphs of Section 2 list many good reasons for not doing the project.

<u>Response</u>: As stated in Volume I (Chapter I), minimizing energy losses in transmitting power is one of several goals BPA seeks to accomplish in developing the project. The cost savings by not incurring these energy losses are significant. Information has been added to Chapter I to clarify the benefit of minimizing energy transmission system losses by building the project. (See also the response to comment numbers 13 and 14 in Part II. L. 2.)

9. <u>Comment</u>: To what effect does the delay or perhaps postponement of the Washington Water Power lines have on the acceptability or the environmentally suitable aspects of the Taft Substation? If they [The Washington Water Power Company] don't want to ever come in to the Silver Valley again or any further, would that influence the BPA decision to use the Taft route?

<u>Response</u>: WWP's decision on whether to build was not a significant factor in identifying the Taft alternative as the environmentally preferred, and so their action would not change this conclusion. The Taft Substation site was picked because it was close to BPA's existing 500-kV Hot Springs-Dworshak line. An integral part of any BPA alternative for this project is to use this line to connect Colstrip power into the 500-kV grid. The Plains Substation site was chosen for the same reason.

10. <u>Comment</u>: I think they [WWP] had four different proposed alternatives and each one seemed to end in Kellogg or Pine Creek. Now, is it that to tie in to that Pine Creek line that runs on down to Chico or is it . . . for some industrial reason that it went in on the Kellogg area?

<u>Response</u>: The reasons to reinforce the Washington Water Power Company (WWP) transmission system in north Idaho are discussed in Chapter I, Volume I of the EIS. WWP feels the need to strengthen their 230-kV transmission system by providing another source of power from Montana into Pine Creek Substation. The line would serve industrial and residential energy loads. It would also provide additional east-west transmisson capacity when Colstrip generating Units 3 and 4 start producing power. Garrison-Spokane EIS Wg0046:02-07-83

#### II. B. OTHER ALTERNATIVES

Several commentors suggested other routing alternatives. Some of the comments generally expressed the concern that BPA look at other routes. Other comments recorded specific route location ideas.

It was suggested: that BPA find a route from Garrison toward Sula, Montana, and then into Idaho; that BPA develop a route along the abandoned Milwaukee railroad right-of-way; that a "Jocko pass" route should be re-evaluated, and that a route near Lookout Pass and along the Coeur d'Alene River might be environmentally and economically preferred.

Others commented on routing variations in the study area. In some cases these were possible routing choices discussed in Chapter IV, ENVIRONMENTAL CONSEQUENCES, of the draft EIS. In other cases, routing adjustments or new localized routing variations were brought up. Commentors often reasoned that these route changes would reduce visual impacts or lessen the effects of the project on the human environment.

Responses to these alternative routing comments follow here, with additional discussion also in Chapter II of the final EIS (Volume I) under "Alternatives Eliminated from Detailed Discussion." The comments on need for local route adjustments and other alternatives pertaining to specific geographic locations are addressed in Part IV of this Volume (GEOGRAPHIC AREAS OF CONCERN).

#### II. B. 1 Other Route Alternatives

1. Comment: . . . Explore in depth other routes.

Response: Over 1100 possible route variations were examined within the route network of the study area for this project. (See Volume I, fig. 4.1.) These constituted virtually all reasonable routes. Other route alternatives were examined and found not reasonable, for a variety of reasons. These are discussed under "Alternatives Eliminated From Detailed Discussion" in Chapter II: ALTERNATIVES INCLUDING THE PROPOSED ACTION of the final EIS.

2. <u>Comment</u>: As part of the environmental impact statement before it's completed, consideration should be given to routing the line from Garrison southwest on National Forest lands toward Sula in an attempt to cross the Bitterroot Valley into Idaho, with the least amount of impact aesthetically (including visual).

Response: A routing through the Sula area into the Magruder Corridor was studied and found unfeasible. Wilderness areas are not available for transmission line locations unless a corridor exclusion is authorized by the President of the United States. To date, the President has never authorized such an exclusion in any wilderness. When Congress designated the River-of-No-Return Wilderness and additions to the Selway-Bitterroot Wilderness (Central Idaho Wilderness Act of 1980), they excluded a 600-footwide corridor along the Elk City road (300 feet either side of center line). The purpose of this exclusion was to provide for road maintenance and drainage and and to ensure that these activities would not disturb the wildernesses. The intent of Congress is to retain the prevailing wild character in this corridor and to provide the necessary room for protection of the road and the wilderness boundaries. The designation of the wilderness areas and the management intent of Congress does not provide for locating a transmission line in the Magruder Corridor.

3. Comment: Run lines along the old Milwaukee right-of-way.

<u>Response</u>: Such a routing has been reviewed. The advantage of using the existing, abandoned railroad corridor would be more than offset by a number of major disadvantages. These include:

1. The railroad is confined in this mountainous country to gradual grades. It encompasses long sweeping curves. A transmission line built on the route would be much longer and more costly than any of the present alternatives. Part of the increased cost would result from the increased length of the line and part from the need for more angle towers.

2. The rail route passes through more populated areas and bottomlands, creating a number of land use conflicts.

3. A transmission line on the rail route could be seen by more people (i.e., from populated areas and I-90).

4. One-track cuts and steep side slopes on the rail route would not allow adequate space for tower foundations, and the uphill slopes in some places would be too close to the conductors to allow adequate electrical clearance. Tunnels would also pose problems.

4. <u>Comment</u>: It was mentioned that there is a route further north yet that still may be the most economical route and that isn't on the map. Is that the one through the Jocko and the Indian Reservation; is that still being looked at, too?

<u>Comment</u>: Follow the Department of Natural Resources EIS recommendations and bypass Missoula County completely, running the lines north through the Flathead Reservation.

<u>Comment</u>: Why isn't the BPA up there talking to the Indian Tribes up there where Montana Power wanted to put their lines?

<u>Comment</u>: We had been led to believe that they couldn't go through the Reservation as was recommended in the statement analysis. This was not explored, other than the fact that two letters were received in 1977. I really don't call this very aggressive negotiation.

<u>Comment</u>: . . . The State-approved route up the Flathead . . . is not even considered in the EIS, except in Chapter II on page twenty-eight where one short statement tells us the State route has higher impacts, period, not specifics. No analysis, no comparison with BPA's route. . . I ask that the Garrison-Spokane EIS Wg0046:02-07-83

final EIS officially include the state-approved route as an alternative in compliance with the requirements of the National Environmental Policy Act.

<u>Response</u>: The powerline corridor to Hot Springs via the Jocko Pass was one of ten alternatives examined in the Federal Colstrip Project EIS (BLM 1979). It was not selected as the approved corridor in the Record of Decision that followed the Colstrip EIS (September 1979). The major impacts of the alternative were outlined in the Colstrip EIS, incorporated in this document by reference, and comparatively evaluated and summarized in the Federal Corridor Option Summary (August 1979).

This route was compared with the proposed route of paralleling BPA's 230-kV line through the Clark Fork Valley, and was clearly found to have more severe environmental consequences in many areas, and substantial advantage only in a single measure of human impact: number of people. Other numan impacts, such as visual, economic, and recreational factors, identified the Jocko alternative as less desirable. Natural resource factors and areas of special management also gave strong preference to the option paralleling BPA's 230-kV line. Environmental and cultural impacts on the "Jocko Primitive Area" strongly argue against the advisability and even the possibility of employing the Jocko Pass option as an available alternative. A recent Montana Department of Natural Resources and Conservation study confirmed these findings. The State-approved route for the reasons mentioned above was rejected and is not considered in detail in the final EIS.

5. <u>Comment</u>: From a different viewpoint, it would appear to me that the line should be routed where it would have the least environmental impact and where access for both construction and maintenance would be cheapest; that would apparently be the route near Lookout Pass and along the South Fork of the Coeur d'Alene River.

Response: The route of least environmental impact is the Taft Plan as it is defined in Volume I of the EIS. The route you describe (Route L in Area Routing Alternative 3, Appendix A, Attachment 3) was eliminated from further study because it would have significantly higher land use, socioeconomic, and natural systems impacts than alternative routes.

6. <u>Comment</u>: My first comment is a general comment regarding the nontreatment in the EIS of the preliminary routing alternatives through north Idaho. The northern route along the existing right-of-way . . . seemed to have been dismissed off-hand. The reasons I was given: that the right-of-way is too narrow and that Coeur d'Alene is a population center are no doubt true, but I'm sure other considerations came into play that I don't feel were adequately addressed in the EIS.

Response: The route referred to above (Route O in Area Routing Alternative 4, Appendix A, Attachment 3) was a preliminary routing alternative, eliminated from detailed discussion. Of the six route options in this comparison, Route O was tied for least preferable because of significant concern for impacts on visual, socioeconomic, forestry, land use and prehistoric resources. 7. <u>Comment:</u> Would the impacts of "A"[Hot Springs Plan] be reduced if the "C" route [Taft Plan] were used . . . from Garrison to Clinton?

<u>Response</u>: The impacts would be greater if Plan C were used to its Rock Creek Crossing, then rerouted across to BPA's existing 230-kV line to the Clinton area and continued to Hot Springs, while paralleling the 230-kV line. From Clinton through Missoula, this alignment would have adverse visual, social, residential, agricultural and other impacts associated with a transmission line located in a developed valley.

8. <u>Comment</u>: Why do two of the three alternatives avoid the Flathead Reservation? Why didn't Montana Power Company look at these alternatives?

<u>Response</u>: The reasons behind the development of alternatives that do not cross the Reservation are outlined in Volume I, under <u>Background of the</u> <u>Project</u> (Chapter I). The Plains alternative was developed initially to ensure a viable connection to the Federal Columbia River Power System in the event that an agreement to use right-of-way on the Reservation couldn't be reached. The Taft alternative emerged from feasibility studies to determine possible ways to complete the Colstrip transmission system and to provide for reinforcing the Washington Water Power Company's service to north Idaho.

The need for these alternatives did not fully surface until after the Montana Power Company had turned over responsibility for the project to BPA.

9. <u>Comment</u>: . . . There is really no alternative route basically from where the three suggested alternatives merge there directly north of Kellogg some miles; . . .

<u>Response</u>: The surrounding area west of the common point was looked at extensively but no route alternatives were identified, because there are relatively few places to exit the mountains and avoid land use conflicts and terrain constraints between Coeur d'Alene and the south end of Lake Pend Oreille.

10. <u>Comment</u>: . . . isn't there an existing subline from Noxon, Montana, to the Bell substations? . . . It is not possible to consider that as a potential route, . . . even though there was an existing line, the right-of-way was already purchased?

<u>Response</u>: An existing line does run trom Noxon to Bell. This was looked at extensively early in the study but was not deemed viable because of the severe impacts that would occur along the Clark Fork Valley and because of its greater length.

#### II. B. 2 Alternatives to Building

Suggested alternatives to building the Garrison-Spokane Project fall into a wide range of categories. Many commentors stated that they simply preferred the No Action alternative because of the environmental impacts associated with each of the plans to build the line. The comments that proposed other courses of action are outlined below.

Garrison-Spokane EIS Wg0046:02-07-83

Many commentors stated that nuclear, wind, solar, geothermal, and hydro energy sources were better options than coal-fired power plants and transmission lines. Others favored a stronger conservation effort in the Pacific Northwest instead of building this line. Some commentors cited the advantages of renewable energy sources and conservation and saw them as providing more permanent jobs in the construction, manufacturing, and service sectors of the economy than did transmission line construction and operations.

Some people suggested shipping coal to the Pacific Northwest by train or truck or using existing transmission lines. Some proposed that the project be ended at Garrison or that new industry be encouraged to locate at Colstrip. And finally, several suggested that Colstrip power be transmitted to other places in the United States.

1. <u>Comment</u>: The No Action consequences and impacts should be identified and measured in comparison with the Action alternative in such a way that the No Action alternative can be considered by decisionmakers as a real possibility even though it may not be shown to be the environmentally preferred alternative.

<u>Response</u>: The reasonably foreseeable consequences of a No Action alternative are presented in Volume I, Chapter II of the Final EIS: ALTERNATIVES INCLUDING THE PROPOSED ACTION. Other environmental consequences may occur as a result of no action, but they are too remote and speculative to evaluate meaningfully.

2. <u>Comment</u>: In view of the greatly reduced load projections, are the decisionmakers taking into consideration seriously the No Action alternative?

<u>Response</u>: The No Action alternative is given serious consideration. However, this alternative would not meet the purpose and need for which the transmission project is proposed.

3. <u>Comment:</u> . . . The NEPA regulations and so forth, one thing that they continually harp on is that <u>No Action</u> has got to be considered as one of the possible alternatives and then they go further into detail about procedures whereby you come up with a concept of reasons for no further consideration of any alternative. Now, as far as I can tell, No Action wasn't given any further consideration, but it was never explained that it was not going to be; it was never really fully addressed. I noticed No Action was not in any of the LRA's, the comparisons with other alternatives, nor with any of the area routing alternatives, and generally, was not given the kind of environmental analysis and comparison that the other routes were. Also, there is a question of, is that an active alternative now because it wasn't stated as no further consideration. I'm under the impression from reading that EIS that there are four alternatives right now, three different preferred or three different routes and No Action, correct me if I'm wrong.

<u>Comment</u>: Is it not misleading when you include in your environmental impact study the No Action alternative when, in essence, that is not an alternative?

<u>Response</u>: The alternative of No Action must, by regulation be addressed in the environmental impact statement. Chapter II of Volume I: ALTERNATIVES INCLUDING THE PROPOSED ACTION contains an evaluation of the reasonably foreseeable environmental and technical consequences of No Action. No Action would not allow BPA to meet the needs for which the project was proposed, namely to integrate the energy from Colstrip Units 1 - 4 and maintain an electrically reliable and stable power system. Additionally, the need for power and the transmission system were established in previous environmental studies (Colstrip Project EIS, 1979; Hot Springs-Bell Environmental Statement, 1975).

No Action was evaluated as a major alternative to building any of the transmission plans. No Action was not used as a choice in local routing options because it cannot be logically compared with route options. The consequences of not connecting parts of the line are equivalent to not realizing any public benefit from the project yet sustaining most of the impacts of its development.

4. <u>Comment</u>: . . . The many benefits of not building this line. These include the many environmental and social costs foregone, land not taken out of production and the elimination of possible adverse health effects caused by the lines. We feel that these benefits far outweigh the decrease in reliability that may occur in the Pacific Northwest grid system without these lines.

<u>Response</u>: The environmental consequences of building the project, described in Chapters II and IV of Volume I, would not occur if a No Action alternative were selected. However, the energy from the Colstrip generating units could not be integrated into the regional transmission system; the existing transmission system would not meet utility standards for reliable and stable operation; and regional energy losses in transmitting power would increase significantly.

5. <u>Comment</u>: Furthermore, there is the larger question of whether the Northwest needs more electrical power. With the Bunker Hill mines crisis still unsolved and the WPPSS disaster, it seems that industry is moving from the area or is likely to move from the area now that we can no longer boast of cheap power rates. Do we actually need these transmission lines? Conservation of our energy resources is apparently working better than anticipated. Reliance on "appropriate technology" could do even more.

<u>Response</u>: The question of need for these transmission lines is addressed in responses to comments 1, 2, and 5 in Part II. A. The project is required to reliably integrate power from coal-fired generating units in eastern Montana. Regarding the "larger question" on the Northwest's needs for electrical power, The Northwest Power Planning Council (representing the States of Washington, Oregon, Idaho, and Montana) is responsible for preparing a long-range plan for the region's energy supply, including plans for energy Garrison-Spokane EIS Wg0046:02-07-83

conservation measures to reduce demand for electricity. This energy plan should be issued in April 1983. The "larger question" is beyond the scope of this environmental statement.

6. <u>Comment</u>: . . . Consideration should be given to ending the line at Garrison and using the power elsewhere, and this should be one of the other alternatives of the final environmental impact statement . . .

<u>Response</u>: The energy scheduled to be integrated into the Federal Columbia River Power System by the Garrison-Spokane 500-kV Transmission Project is contractually obligated to the Colstrip Project participants to serve their loads in Montana and the Pacific Northwest. Ending the line at Garrison and using the power elsewhere would not be a viable alternative to meet the needs defined in Volume I, Chapter I: PURPOSE OF AND NEED FOR ACTION. Energy from Colstrip Unit 4 could not be reliably integrated into the regional power grid and the energy could not be adequately delivered to the service areas of the Colstrip project participants (Montana Power Company, Pacific Power and Light, Portland General Electric, The Washington Water Power Company, and Puget Sound Power and Light).

#### II. C. CORRIDOR DEVELOPMENT/FUTURE PLANNING

People expressed concern over the need to construct future lines and establish additional corridors. They also questioned the need to develop a new corridor instead of using existing right-of-way. Also, concern about the capability of existing right-of-way and future corridors to accommodate additional lines was expressed. Additional concerns include the fate of the corridor when the lines are no longer needed and the impacts associated with substation siting.

1. <u>Comment</u>: Many comments were received on both sides of the issue of whether to site a line through existing corridor or through new right-of-way. Those who favored use of existing corridor cited: stated Federal policy preferences for using existing corridors where possible; the minimal increase in visual quality reduction where lines and other utilities already exist; the advantage of reducing costs (since existing lines tend to follow valleys and flatter land and would require less complex engineering to build) and of reducing amount of new clearing; the minimizing of impacts on natural resources, including wildlife; and the fact that the originally approved State of Montana route did follow the Clark Fork Valley and the existing corridor to a point.

Those who favor avoiding the existing right-of-way and creating a new corridor cite the advantages to private ownership found in siting the line on a greater percentage of public land (concentrated not in the valleys but back in the mountains); a lesser degree of land use conflict; the advantage of having the line out of sight of a greater number of people; political preference as expressed in scoping and by Congressional delegates as well as by other governmental bodies; and opportunity to prevent further degradation of visual quality in the valleys of the study area. <u>Response</u>: The process of environmental study, by definition, must establish a balance of impacts on resources. The aim is to affect the fewest resources and to incur the least environmental impact. Some goals of the tradeoff are contradicted by others: for instance, avoiding impacts on people often means increasing impacts on natural resources. The arguments presented in the comment above accurately reflect the kinds of tradeoffs that were balanced when deciding where to site the line for the project--in an existing right-of-way or through a new corridor. Much of the scoping for this project reflected a concern that the line be kept away from people and out of the valleys. BPA has a policy to parallel existing transmission line rights-of-way where feasible. The interdisciplinary team weighed all consequences of building the line in determining such feasibility.

An entirely parallel route between Garrison Substation and Spokane was considered. It would require the least access and remove the least amount of forestland from production. Much of the existing corridor it would use is located through or across valleys, such as Flint Creek, Clark Fork, and Rattlesnake. These valleys have, since the construction of the 230-kV line, been subdivided for residences and developed for irrigated farm land. If the 500-kV line were to parallel the existing line, it would have a socioeconomic and visual impact on the valley areas because the 500-kV double-circuit line is considerably larger than the existing 230-kV line. The line would also be the longest alternative.

The best-ranked routes for each plan parallel where that is the best environmental choice and open up new corridor where that option is the best choice. The proposed action has very little paralleling, and thus will remove more forestland from production, will require more access roads, will cost more, and will be slightly less preferable electrically. However, the advantages of reducing impacts on people and on associated land uses were considered to be more important.

If the 500-kV double-circuit line were constructed on the existing right-of-way, it is not likely that a new line in the future could parallel the existing corridor through the valley areas. The new routes could accommodate a future line, should one ever be needed.

2. Comment: Will more lines be built in the corridor chosen?

<u>Response</u>: When a new corridor is planned for a transmission line, the location criteria take into account paralleling of possible future lines. No ultra high voltage (UHV) lines such as the proposed double-circuit 500-kV lines are anticipated in BPA's 20-year forecast. However, it conditions change, a UHV line could be needed. The uncertainties which surround new lines include the location of the generating facility, the destination of the transmitted power, and the purpose (load growth, reliability) of the line. An environmental impact statement process would be conducted with any new line.

3. <u>Comment</u>: If the present right-of-way is used, would more lines be built there in the future?

<u>Response</u>: Terrain and land use constraints make it unlikely that a future UHV line would parallel BPA's existing 230-kV line if the vacant right-of-way were used by the proposed 500-kV line. It is possible that all or part of the 230-kV line could be replaced by a future UHV line, if studies indicate that replacement is feasible. The Salish and Kootenai Tribal Council is also challenging BPA's legal right to build the proposed 500-kV line on BPA's existing vacant parallel right-of-way on the Flathead Reservation and questioning BPA's ability to parallel this corridor with future UHV lines. (See Part II. D. 3 of this Volume). Negotiations are continuing between BPA and the Tribal Council.

4. <u>Comment:</u> What effects will other future projects such as Montana Power Company's proposed Great Falls Project have on this line?

<u>Response</u>: The proposed Montana Power line in the Great Falls area is not part of this project and will not directly tie into the proposed Colstrip lines.

5. Comment: What will happen when you don't need the line anymore?

Response: If a transmission line is no longer necessary it could be replaced by a larger line, sold to another utility, left standing idle, or scrapped. In the latter case, rights-of-way easements would be relinquished by BPA. (Also see comment/response #5 under Part II. L. 1 - <u>Technical</u> Considerations, and p. II-7 of Volume I.)

6. Comment: Have other corridors been considered?

Response: Other east-west electrical utility corridors were identified and evaluated in BPA's Pacific Northwest Long Range East-West Energy Corridor Study, Phase I (1977) report. This report found seven corridors to be feasible. Of these, three have been eliminated because areas they crossed are as of now in Wilderness status. Of the remaining four, two go through the Missoula area, one through the Salmon River area, and one through the Snake River Basin area.

7. <u>Comment</u>: What determines the location of a substation and is there a thought of one between Bell and Rathdrum?

<u>Response</u>: Substations are located so that existing and/or future lines could be tied together in the most economical fashion for all participating utilities. They are also located central to areas with electrical demand. Substations should be situated on relatively flat terrain, be geologically stable, have adequate drainage, have good access, and be compatible with land use plans.

There is a substation at Rathdrum. No new substation is planned between Bell and Rathdrum.

8. <u>Comment</u>: Goal number four, . . . is to provide for potential future reinforcement of the electrical service to Missoula. That's a nebulous thing, probably more of concern to BPA and the people there.

<u>Comment</u>: . . . You want to provide for potential future reinforcement of electrical service to Missoula. I think that the headlines on the <u>Missoulian</u> today about a decrease in population in Missoula would kind of take the weight out of that one.

Response: The routings are not contingent on supplying future power to Missoula. Due to other constraints such as Wilderness and Primitive areas, the transmission line corridor must go through the Missoula area. If additional power should be necessary, the Hot Springs Plan could, in the future, be tied into the Montana Power's Rattlesnake Substation. The Taft or Plains Plans could be tied into Montana Power's Miller Creek Substation.

An additional source of power is likely to be needed in the 1990's or possibly later. Location of this line reasonably near the Missoula Valley would provide a convenient source of energy, thereby minimizing future line construction.

9. <u>Comment</u>: Concern for future corridor development in Mineral County; a comprehensive plan is needed.

<u>Response</u>: If a corridor is developed through Mineral County, further study and coordination with planners would be undertaken. BPA, through its environmental studies, evaluates local land use patterns and land use or comprehensive plans in order to minimize impacts on specific land uses.

10. <u>Comment</u>: Paralleling the existing route is preferred because removal of existing lines would open up farm fields.

<u>Response</u>: Paralleling doesn't imply removal. The only place BPA is contemplating removal of existing lines is in the Hot Springs to Thompson Falls section (Hot Springs or part of Plains Plan). This would not open up new land because the line would be rebuilt on larger towers.

11. <u>Comment</u>: It is apparent that long-range plans have not been addressed in these community meetings. . . We would like to know more detail, what we can seek in the way of additional power lines, pipelines, coal trains, nuclear power plants, hydroelectric dams, etc., within the next fifty years. I don't think fifty years is an unreasonable planning horizon either. . .

<u>Response</u>: The task of developing a long-range energy plan for the next 50 years is outside the scope of the Garrison-Spokane Transmission Project EIS. However, the Northwest Power Planning Council, created under provisions of the Pacific Northwest Electric Power Planning and Conservation Act, is responsible for long-range planning for the region's energy supply. This energy plan should be issued in April 1983.

12. <u>Comment</u>: Is it possible for you people to project on past the nineties to the time when, . . . you are going to bring all the power to the west coast? Are you, then, planning eventually to sell it to California?

<u>Comment</u>: . . . I . . . understand that most of this power that is being brought in for this line is basically for even west of us? . . . [are] all existing lines west of Spokane . . . large enough to carry this additional power or are we going to be adding even more lines to run across the state [of Washington]?

<u>Response</u>: As stated in Volume I of the EIS, this project is proposed to integrate energy reliably from Colstrip generating units. It will be a major east-west energy transmission path, and it will be part of the backbone power grid transmitting energy to Montana, Idaho, Washington and Oregon. The line will not simply bring all the power to the West Coast, it will serve the region's interconnected utilities. The existing transmission system west of Spokane has enough capacity to carry power to load centers west of there.

### II. D. LEGAL CONCERNS

Comments on legal issues have focused on the Draft EIS and BPA's compliance with the National Environmental Policy Act (NEPA) and the Montana Major Facility Siting Act, and on the perceived segmentation of the Townsend-Spokane transmission line into two pieces for EIS purposes. A few people also addressed the project's compliance with local land use plans, the legal status of the right-of-way across the Flathead Indian Reservation, the timing of the socioeconomic report, and impacts on corporate timberland. One commentor addressed compliance with the State of Washington's Facility Siting Act.

## II. D. 1 National Environmental Policy Act (NEPA) / "Segmentation"

Most commentors on BPA's compliance with NEPA have generally stated the opinion that the Draft EIS is either not in compliance with or in violation of NEPA because it does not adequately cover the project's environmental impacts. A few commentors stated that BPA should not commit resources which might prejudice selection of an alternative and claimed BPA had done so on the Townsend-Garrison line.

Several commentors also stated that segmentation of the Townsend-Spokane line at Garrison into two separate projects for site selection and EIS purposes unfairly prejudices the location of the second line and does not allow for alternatives around Garrison. Some stated that this segmentation was in violation of NEPA and others simply stated that it was unfair or inappropriate.

1. <u>Comment</u>: The first item is the piecemeal approach to the EIS preparation. Previous departures from the NEPA process by BPA have been significant. An example is . . . ordering steel for the Townsend-Garrison line prior to approval under the NEPA process . . . in section 1502.2 (F) and (G) (NEPA) requires that agencies shall not commit resources prejudicing selection of alternatives and in effect make advance decisions.

Response: BPA has not deviated from NEPA regulations. Steel was ordered for Townsend-Garrison after the original Record of Decision for the Federal Colstrip Project EIS, but prior to the Record of Decision on the Colstrip EIS Supplement. Excess steel was ordered to cover all alternatives so as not to prejudice route selection at Boulder, Deer Lodge and Garrison, and still enable the energization schedule to be met.

2. <u>Comment</u>: The regulations governing NEPA, published by the Council on Environmental Quality, state that, "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft on the appropriate portion" (CEQ, Sec. 1502.9A). I submit that an analysis of a southern alternative is warranted, and will satisfy the "revised draft" portion of the regulations.

<u>Response</u>: The "southern alternative" ("E" corridor near Maxville) is a minor variation of the Taft Plan. This new variation is evaluated in this final EIS. (See Part III.B of this Comment/Response Volume for further discussion.) A supplemental or "revised draft" EIS will not be required.

3. <u>Comment</u>: I have just tinished reading your EIS summary on the proposed 500-kV Garrison-Spokane project and find that you have almost wholly evaded or subverted the intent and purpose of the National Environmental Policy Act regarding such statements.

The Act requires you to submit a statement outlining in detail the impact, good and bad, that your project will have on the environment: i.e., soils, watershed, streams, air, agricultural and forest land, wildlife, human life, etc., that the transmission lines cross. You have not done so. Instead, you have taken a page and a quarter to tell us what we already knew; that is, if you did not build the line then such inaction would have no effect on the environment whatsoever except adversely economically.

<u>Response</u>: The EIS Summary is a synopsis of the overall document. The complete draft EIS contains the detailed evaluation of impacts that the project would have on the environment.

4. <u>Comment</u>: BPA's splitting the line into two pieces or separate segments for EIS purposes is inappropriate and illegal, a flagrant violation of NEPA. The powerline should be considered as a whole not in segments.

Response: Segmentation (dividing a project into parts) is not in itself illegal. Criteria used to judge whether segmentation is proper were formulated by the Ninth Circuit in Daly v. Volpe, 514 F.2d 1106 (9th Cir. 1975). They are: (1) whether a segment has independent utility; (2) whether the length selected assures adequate opportunity for the consideration of alternatives; and (3) whether the segment fulfills important state and local needs. In District Court review of the Colstrip transmission project, Judge James F. Battin found in January 1982 that "consideration. . . . Finally, we believe that the segmentation of the EIS studies fulfilled certain state and local needs. Each of the segments under consideration is essential to completion of the transmission grid which, in turn will satisfy Montana's increased energy needs. The segmentation may also facilitate more comprehensive study of a smaller area and thus provide a better background for the agency's final decision. In sum, we feel that the <u>Daly v. Volpe</u> criteria have been met and that the EIS segmentation adopted by the federal agencies was entirely reasonable." (County of Missoula v. Peter Johnson)

5. <u>Comment</u>: These hearings are premature. The May 28, 1982 comment deadline should be extended until hearings before the Montana Board of Natural Resources in Helena concerning the first segment of this line have been completed. The placement of the first segment of the line will directly affect the location of the second segment. Additional hearings on the draft EIS for Garrison West may be needed because segmentation of the lines is in violation of NEPA and unfairly biases the line down the Clark Fork Valley.

<u>Response</u>: The question of segmentation has been addressed in the comment above. Extensive opportunities for public review already exist. The draft EIS review period ran from March 16 through May 28, 1982. The State of Montana is conducting an independent review of the Garrison-Spokane Transmission Project, including opportunity for public comment. A lengthy review and comment period has already been provided for the draft EIS. And there will be a 30-day waiting period after the final EIS is issued before a decision is made on the project.

6. <u>Comment</u>: BPA has segmented the line into separate units with separate EIS's. The issue of need for the line and power must be established independently in each EIS. BPA should then look at the project on a go, no go basis and not just where to place the line.

<u>Response</u>: The needs for which this project is proposed are: 1) to integrate and transmit additional electric power supplied by the Colstrip generating units, and 2) to maintain the electrical reliability of the Federal Columbia River Transmission System. Chapter I: PURPOSE OF AND NEED FOR ACTION substantiates these reasons for proposing the project. The original need for the generating units and transmission system has been established under the Montana Major Facility Siting Act and the Federal environmental statement on the Colstrip Project. The Garrison-Spokane EIS focuses on issues which are ready to be decided and excludes from decision those issues already decided. See Part II. A of this volume for further discussion of the issue of need.

7. <u>Comment</u>: There has been no document for public review that directly compares the impacts of all potential transmission line routes for the Colstrip project. For example the state approved route and BPA's preferred route. This is a violation of NEPA. A supplemental EIS comparing all routes should be published for public review.

Response: Numerous studies have been conducted evaluating potential transmission line routes for the Colstrip Project. The Federal Colstrip Project EIS contained a comparative evaluation of a full range of electrical plans and transmission corridors. Subsequent studies, the Colstrip Project EIS Supplement and the Garrison-Spokane 500-kV Transmission Project EIS, have focused on more localized and site-specific variations and/or new alternatives. This sequence (called "tiering") allows focus on the broad issues for the full range of alternative corridors, followed by focus on site-specific variations of lesser scope. The interdisciplinary team decided not to re-examine all broad scale alternatives every time a site-specific variation was raised.

8. <u>Comment</u>: In conclusion, we believe the DEIS has not adequately discussed the impacts this project will have on Burlington-Northern timberlands (BNTI). According to the National Environmental Policy Act, Section 1502.1, the EIS, ". . . shall provide full and fair discussion of significant environmental impacts and shall inform . . . the public of reasonable alternatives which would avoid or minimize adverse impacts . . . " In order to comply with these requirements, we believe the BPA should more fully analyze our expressed concerns and clearly portray these findings in the EIS.

Response: On each alternative some Burlington Northern timberlands may be affected. Concerns expressed in the letter focus on reduction in forestland base, potential road system impacts, future corridor expansion, and need for more detailed information related to BNTI. The environmental consequences (Chapter IV of Volume I) related to these issues are disclosed to the extent that they are known and knowable prior to the decision among alternatives and subsequent detailed survey, design, and landowner consultation. Mitigation measures that reduce or avoid many adverse environmental effects related to these issues are also listed in Chapters II and IV of Volume I. BPA works closely with all landowners in siting transmission lines and in developing site-specific mitigation.

9. <u>Comment</u>: I would like to see statements in the EIS which confirm compliance with NEPA standards. Pertinent standards could be cited and the compliance measures listed.

<u>Response</u>: Such statements appear in Chapter IV of Volume I, in the section entitled Consultation, Review, and Permit Requirements.

# II. D. 2 Compliance With Other State and Federal Facility Siting and Planning Acts

Numerous concerns were expressed that BPA should comply with, or should come under, the provisions of the Montana State Facility Siting Act. Most commentors stated that BPA should comply with the Act, but did not provide reasons. One commentor stated that BPA should be subject to the same rules that regulate private industry; others stated that no public hearings on the EIS should be held until BPA satisfies the substantive requirements of the Act. A few other commentors noted that Montanans should be given a chance to review the State's decision on compliance before the comment period on the draft EIS is closed.

One commentor also felt that BPA should comply with the Washington Siting Act (Idaho has no such legislation). Compliance with the provisions of other planning legislation, such as the Federal Land Policy Management Act and the National Forest Management Act, was also recommended by several commentors.

1. <u>Comment</u>: The BPA should comply with the Montana State Major Facility Siting Act.

<u>Comment</u>: BPA should not hold its meetings to receive comments on the draft EIS until the State of Montana has ruled on whether BPA complies with the substantive provisions of the Montana State Facility Siting Act.

<u>Response</u>: Receiving comments does not prejudice decisions on the action to be taken. The draft EIS review period, which ran from March 16 through May 28, 1982, was not extended because ongoing opportunities for public review still existed. The State of Montana is conducting an independent review of the Garrison-Spokane Transmission Project, including opportunity for public comment. A lengthy review and comment period was already provided for the draft EIS. And there will be a 30-day waiting period after the Final EIS is issued before a decision is made on the project.

Recent court rulings affirm that under the United States Constitution, a Federal agency is not subject to state regulation unless Congress has so specified. The BPA is not obligated to follow the procedural rules of the Montana Major Facility Siting Act. However, the Federal agencies are attempting to meet the objectives of these laws, which are generally consistent with NEPA, in the siting of the project.

Judge Battin, Chief United States District Judge for the District of Montana, ruled in May 1982 (in <u>County of Missoula v. Peter Johnson</u>) that BPA should submit information to the State of Montana so that the State may decide whether BPA has complied with the substantive standards of the Montana Major Facility Siting Act. BPA has submitted that information for both the Townsend-Garrison line and the Garrison-Spokane lines. To date, the State has found that the Townsend-Garrison line is acceptable, with appropriate mitigation. The State is presently reviewing the studies on the Garrison-Spokane line. That review is scheduled to be completed before a decision on the Garrison-Spokane Transmission Project.

2. <u>Comment</u>: The representatives of Bonneville Power Administration would like you to think that all this is up to Garrison and so, therefore, all we're talking about at that point is from Garrison west. I respectfully submit that is not necessarily true. Going back on the history of this job, as I recall the history of it, the Montana Power Company was supposed to have built this line and supply power from Colstrip toward the west coast and if I recall my history correctly, had a siting under the Montana Major Siting Act that was approved. That never went through Garrison and never went through Maxville or anywhere near this area. And it was approved under the substantive standards of the Montana Major Siting Act.

<u>Response</u>: Cnapter I of Volume I contains a section on background of the project. It briefly traces the involvement of the Montana Power Company, the State of Montana, and the Bonneville Power Administration. Regarding what was approved under the Montana Major Facility Siting Act, the State of Montana approved the application for Colstrip Units 3 and 4 and its transmission system, and granted a Certificate of Environmental Compatibility and Public Need in July 1976. The approved route, which was not located near Garrison or Maxville, was the one applied for by the Montana Power Company. Subsequently, the Federal decision, based on a comparative study of corridors, found the "Townsend-Boulder" corridor to be the preferred alternative. Because of controversy over centerline and corridor location, a supplemental EIS was issued on the Townsend-Garrison part of the Colstrip transmission system. This line was reviewed by the State of Montana and found to meet substantive standards of the Siting Act, subject to certain conditions. The Garrison-Spokane project EIS considers alternatives north and south of the approved corridor, in response to concerns voiced by the public. As mentioned above, this project, too, is being reviewed by the State of Montana to ensure that it meets the substantive standards of the Siting Act.

3. <u>Comment</u>: Also, why is the BPA's preferred site so different than the site selected by the State of Montana after the rigorous selection process undertaken by the state? What does the BPA know that the state doesn't? . . . they [BPA] should, at least, follow the state's Siting Act.

<u>Response</u>: For the Colstrip Project, the State's selected corridor and the federally approved corridor are the same for most of the route, except in Western Montana, where some routing studies for this project are still in progress. The comparative evaluation of corridors contained in the Colstrip EIS (1979) indicates that there are significant environmental problems associated with the State-approved corridor in the western part of the routing, particularly the constraint and feasibility of building a line through the "Jocko Primitive Area." Although the federally approved routing does encounter some environmentally sensitive areas, it was judged by the Federal decisionmakers to be preferable to the State-approved corridor. For additional information, please refer to the Colstrip Project EIS (1979) and the Federal Record of Decision issued in September 1979. See also the response to comment #4 in Part II. B. 1.

For response on the Montana Major Facility Siting Act, see the previous comment/response.

4. <u>Comment</u>: EFSEC (Washington State Energy Facility Siting Evaluation Council) has raised specific concerns about substantive standards and recent court cases involving compliance with these standards. Three references [from the EIS] in essence state that BPA will not meet the Washington State standards (5th edition of the National Electrical Safety Code [NESC]) either substantively or actually:

1. BPA will not comply with any Washington State Siting standards for transmission systems.

2. BPA will meet Washington State Substantive Standards "to the extent practicable."

3. BPA "may not be consistent" with Washington State standards which are more restrictive than the Standards BPA uses for construction.

No reference is made to substantive standards relating to location, noise, construction impacts which are normally considered in siting of energy

facilities. EFSEC has been more concerned with these impacts and mitigations than the NESC.

The only way to determine EFSEC standards has been through the hearing process and much more detail than can be found in this EIS. The reasons BPA must consider substantive standards are two court cases [Columbia Basin Land Protection Association, etc., vs. Schlesinger and the State of Montana vs. Peter Johnson] which reached substantially the same findings. . . It appears the draft EIS is deficient in that it doesn't reference the necessity for Washington State concurrence or approval of compliance with substantive standards of EFSEC.

It also appears that BPA on the basis of the draft EIS intends to make no effort to comply with the Columbia Basin case by providing sufficient information to EFSEC to evaluate the transmission line for compliance with substantive standards.

Response: These comments have been addressed by revising the EIS Summary and Chapter IV (Consultation, Review, and Permit Requirements). Also, in specific response to the State's request, BPA has met with representatives of the Washington EFSEC. Unless otherwise notified by the State, we assume that the information submitted through the NEPA process, including the direct contacts, has provided sufficient information to meet the State's needs. BPA will attempt to respond promptly to any other requests for information.

5. <u>Comment</u>: In the Federal Land Policy and Management Act, Section 503 requires that rights-of-way in common should be used to the extent practical, and that the Secretary concerned shall take into consideration State land use policies. It is my understanding that the USDA has stated that the Forest Service would not require BPA to comply with the mandatory right-of-way condition contained in the Federal Land Policy and Management Act, that right-of-way permittees must comply with state siting laws. It seems that a highly significant condition in this law has not been addressed--that existing rights-of-way be utilized to the extent practical. It is distressing that the BPA draft EIS on the Garrison-Spokane power lines proliferates separate rights-of-way across Montana. It appears that BPA is not in compliance with Section 503. It is my understanding the the "Secretary concerned" has the legal obligation to direct the BPA to utilize existing right-of-way.

Response: The issue of whether the Federal Government is subject to state siting laws is a complicated one that is in part being clarified through court rulings. In general, though, Federal projects should meet substantive standards defined in State siting acts, but Federal agencies are not required to follow State administrative procedural requirements. (See previous responses.)

The issue of following existing rights-of-way to the extent practicable is addressed in Volume I under the heading of Corridor Development and in Part II. C of this Volume. As discussed, there are pros and cons to paralleling existing rights-of-way. Findings on the environmentally preferred alternative and determination of the proposed action did take into account use of existing right-of-way as much as is practical, considering the goal of minimal environmental effect.

The Forest Service and the Bureau of Land Management are cooperating agencies and decisionmaking agencies on this project because of their responsibility to allocate land use on Federal lands in a manner consistent with Federal Land Policy.

6. <u>Comment</u>: The requirements of both the Federal Land Policy and Management Act, and the National Forest Management Act, both enacted in 1976. . .must be stringently enforced by the Forest Service.

<u>Response</u>: The Forest Service and the Bureau of Land Management are cooperating decisionmaking agencies on this project, and as such can be expected to adhere to their governing regulations.

7. Comment: Most counties through which alternative segments pass have adopted some form of land use plans. All the plans state that undeveloped landscapes are to be protected in order to maintain environmental quality and preserve existing rural atmospheres. This goal is not being accomplished by choosing a preferred route that goes through an area where there is virtually no existing power lines or easements.

<u>Response</u>: Both developed and undeveloped resources are addressed by county plans, with an overall goal to maintain environmental quality and to preserve the existing atmosphere of many areas. Where any route minimizes conflict with developing land uses, it will initiate or increase conflicts with undeveloped land uses. In response to extensive public comment, BPA has attempted to site the line where the least overall environmental impact on all resources will occur. (See also responses in Part II. G. 3.) BPA will develop the project in such a way as to minimize the adverse effects on environmental quality and to avoid or minimize alteration of an area's rural atmosphere. Mitigating measures to reduce adverse effects of the project will be incorporated as part of the proposal. (See Volume I, Chapter II for more detail on such measures; and in Chapter IV, <u>Consultation, Review, and Permit</u> Requirements.)

8. <u>Comment</u>: . . . How does Bonneville Power plan on what sort of dealings they are going to have with the Department of Natural Resources after they've gathered all these materials? Just ignore the Department of Natural Resources?

<u>Response</u>: The Bonneville Power Administration has entered into a cooperative agreement with the State of Montana to facilitate review of the project by the State and ensure that the project is consistent with substantive standards of the Major Facility Siting Act.

### II. D. 3 Flathead Indian Reservation Right-of-Way

The legal status of the present right-of-way held by BPA across the Flathead Indian Reservation and uncertainty of making an accord with the Confederated Salish and Kootenai Tribes remain concerns should the Hot Springs route be selected. 1. <u>Comment</u>: Selection of a transmission line route crossing the Flathead Reservation without bringing the position of the [Confederated Salish and Kootenai] Tribes to the attention of the decisionmakers, in our opinion, would make the final impact statement deficient. For example, the Tribes have raised specific legal points questioning Bonneville's right to utilize the existing 230-kV right-of-way to construct the proposed double-circuit lines. The Tribes' position regarding the availability and the scope of the existing right-of-way also bears on whether the proposed Hot Springs Plan offers sufficient options for future power development. The Draft EIS, however, gives only the most cursory treatment of the Tribes' arguments. (See Draft EIS, pp. II-11, IV-46)... The Tribes [are opposed] to the transmission lines crossing their Reservation. The Tribes will proceed to court, if necessary, to receive judicial confirmation of their rights.

Reservation of the Confederated Salish and Kootenai Tribes. In 1951, the Tribes granted a 250-foot-wide right-of-way to BPA for a 230-kV wood pole transmission line (Hot Springs-Anaconda line) which was constructed on one-half of the right-of-way, with the other half reserved for future use. The Hot Springs Plan proposes to use the vacant half of the existing 250-foot-wide Hot Springs-Anaconda right-of-way.

The Tribes take the position that use of the right-of-way to locate, construct, and operate the proposed double-circuit, 500-kV Colstrip facilities would be beyond the scope of the original grant. The Tribes also take the position that the duration of this right-of-way is limited to 50 years (1951-2000).

In contrast, it is BPA's position that it applied for, appraised, and paid for a perpetual right-of-way easement, that the existing 250-foot-wide right-of-way is of sufficient width to support a double-circuit, 500-kV transmission line, and that such use is within the terms of the right-of-way easement.

Implementation of the Hot Springs option would require settlement with the Tribes for a presently undetermined amount of consideration, or, in the alternative, would require judicial or legislative resolution with the attendant delays and uncertainties.

# II. E. WHO PAYS/WHO BENEFITS

Commentors expressed the opinion that it was unfair for one group to be the primary beneficiaries of the project while another group would have to bear its environmental costs.

1. <u>Comment</u>: The social and environmental costs of the line will be borne largely by Montanans, while the power itself, and thus the benefits of the line, are destined for the West Coast.

Response: In addition to transmitting the output of Colstrip Generating Units 3 and 4, these transmission facilities will strengthen the transmission system within Montana in that outages and loss of load will be reduced. Reliability of service will be improved, for example, for Missoula, Anaconda, Great Falls, and their surrounding areas. Additional transmission will be available for emergency power transfers of various kinds.

More than 40 percent of the power produced by Colstrip 3 and 4 will go directly to Montana and Idaho customers. Two investor-owned utilities which are participating in the construction of these generating units--Montana Power Company and Pacific Power and Light Company--serve retail users of electricity in Montana. We estimate that the Colstrip lines will supply 560 megawatts of power for the Montana loads of these two companies. Present loads of Pacific Power in northwest Montana are being served from the West Coast by generation that includes the large coal-fired plant at Centralia, Washington, in which Pacific Power is a participant.

Finally, the social and environmental costs of the building and operation of this line are taken into account in trying to determine a location for the line which will create the least environmental impact.

2. <u>Comment</u> I would like to know why we have to put up with this ugly eyesore when we receive little or no benefits from it. To my understanding we will receive no money, few if any jobs which will be short-termed at best, no tax relief and no power. In fact, it's my understanding that our power bills will be increased to cover the cost of this line that we don't want. I also understand that it will affect our school funding by decreasing it. So in fact, this powerline is a threat to our children's education.

<u>Response:</u> The project will generate short-term economic benefits to local communities during construction. When all of the workers employed on the project make expenditures in the local economy, they will generate several million dollars worth of income (see Chapter IV of Volume I). Much of the cost of the transmission facilities would be recovered from wheeling use charges to the Colstrip project participants; remaining costs would be added to BPA's rate base. The transmission project would not appreciably increase power bills. (See Part II. L. 2 for further discussion.) Added school funding costs or other increased local government service costs required as a result of the project construction work force may be compensated for through an impact aid formula BPA is developing. The impact aid provision is meant to alleviate extra local government service expenditures needed as a result of the project. (See also responses in Part II. K.)

# II. F. WHY BPA IS BUILDING THIS PART OF THE LINE

The history of the project is lengthy and rather complicated. Commentors most often asked why BPA, rather than Montana Power Company, was building this part of the line, since Montana Power was originally scheduled to do so. Since that change meant that tax revenues anticipated from private ownership would not materialize, the question was linked to other financial concerns (see also Part II. K, Taxes/Impact Aid).

1. <u>Comment</u>: Why is Bonneville Power Administration building the line instead of Montana Power Company, since it will be used to transmit private power? Does BPA have the right to build this far east?

<u>Comment</u>: And I really wonder what kind of a deal BPA had with Montana Power in the fact that they went ahead, they took over this line, they built it and then they didn't have any agreement from Montana Power. It almost makes you think that this thing was all prejudged many, many years ago.

<u>Response</u>: BPA is permitted by the Federal Columbia River Transmission System Act to integrate all federally produced, as well as all non-federally produced, power within its service area. That service area extends as far as 75 miles east of the Continental Divide. The project study area is within those limits.

BPA was originally scheduled to integrate this power through its Hot Springs Substation and had planned from the beginning to build the line from this substation west. However, it extended the point of power integration farther east, at the request of the Montana Power Company. The State-approved route crossed the Flathead Indian Reservation, where MPC had no right-ot-way. BPA currently possesses a vacant right-of-way across the Reservation. (Also see Part II. D. 3.)

2. <u>Comment</u>: BPA should return the project to the Montana Power Company so that affected county governments will be able to tax the facilities and provide a stronger tax base.

<u>Comment</u>: Why, since Montana Power Company originally planned to build the line all the way to Hot Springs or elsewhere, is BPA now proposing to build it? Why won't BPA reverse itself and return the project to Montana Power Company?

<u>Response</u>: Originally, the Colstrip Project Management (CPM) consortium was scheduled to build transmission facilities to a point west of Townsend--probably Hot Springs--for integration of power into the Bonneville Power Administration (BPA) main transmission grid. After The Montana Power Company's request in September 1977 that BPA build the integrating transmission westward from the Helena area, BPA sought and received Congressional authorization to undertake such integration. Public Law 95-482 (earlier, House Joint Resolution 1139, passed October 18, 1978) incorporated language from the earlier H.R. 12928:

"Provided, that expenditures from the Bonneville Power Administration Fund established by Public Law 93-954 are hereby specifically approved . . . for the construction of facilities to integrate new generating facilities at Colstrip, Montana, and the Bonneville Power Administration transmission grid."

Based upon this legislation, BPA negotiated an agreement with CPM to build the needed transmission facilities from Townsend westward to the Spokane area.

BPA is legally obligated by this agreement to build the line; construction needs to be started soon and completed on time. Delays of the project to-date have seriously jeopardized our ability to provide integration of the generating units as they come on line. For BPA to abandon its responsibilities would render impossible this timely integration and would be extremely costly to Northwest ratepayers, including Montanans.

Federal law currently prohibits BPA from making in-lieu tax payments. However, the BPA Administrator, under provisions of the Pacific Northwest Electric Power Planning and Conservation Act, may make impact aid payments to local governments to compensate for increased services required because of the transmission project. (See also responses in Part II. K.)

3. <u>Comment</u>: If the preferred route [Taft Plan] does not pass through the Flathead Indian Reservation, why is BPA and not MPC building the line?

<u>Response</u>: As stated above, the Montana Power Company, in September 1977, requested that BPA, under the provisions of the Federal Columbia River Transmission Act (P.L. 93-454), construct part of the Colstrip integrating transmission system. BPA conditionally agreed to do so. In studying alternative routes, BPA evaluated routes on and off the Flathead Reservation. The Hot Springs and Plains Substations were evaluated in the Federal Colstrip Project EIS. The Taft Substation terminal was a new alternative in 1979 and one of the primary reasons for revising and reissuing the Hot Springs to Bell EIS.

4. <u>Comment</u>: I think another alternative you ought to consider is just breaking the contract, cutting Montana Power loose and let the private utilities work it out, let them pay for it, . . .

<u>Response</u>: Based on Congressional authorization, the Federal Columbia River Transmission System Act and other considerations, BPA is responsible for construction of the Garrison-Spokane 500-kV Transmission Project. The private utilities through contractual arrangements will be charged for that portion of the Federal facilities they utilize to serve their customers.

### II. G. HOW WE DID THE STUDY

Comments on how we did the study can be separated into comments on public involvement and decisionmaking, process/methodology, and evaluation criteria.

## II. G. 1 Public Involvement and Decisionmaking

Many commentors on this subject stated that BPA had not involved enough local landowners in the initial selection of route alternatives. A number of these commentors asked why a meeting had or had not been held in a particular community (i.e., Alberton, Huson, Hall). Some simply complained about being excluded from the scoping process and others asked for the names of those landowners or residents who had been consulted during the initial siting process. Other comments requested that all landowners within one mile of proposed routes be notified of that fact in writing.

A few commentors stated that BPA's public involvement program was being used to find a place of "least resistance" for the location of the transmission line route. Others posed questions about whether new routes were part of the scoping process or part of the comment process. A few expressed a desire to have decisionmakers present at the draft EIS hearings or to arrange a special meeting between the decisionmakers and the public.

Several commentors expressed the viewpoint that BPA had already made up its mind and would not listen to any comments. Others requested that the hearings and comment period be extended until after the State of Montana had completed its review. A few stated that because of the necessity to begin construction of the line, the public was not being given enough time to consider the points raised at public meetings.

And finally, numbers of people asked questions about how public input from scoping meetings and the draft EIS hearings would be incorporated into the final EIS and would affect decisions.

Numerous commentors on the topics above simply made statements or expressed opinions that could not be responded to. These comments frequently included statements that the public was excluded from the scoping process ("By excluding the public from the scoping process, you have clearly proven BPA to be the most unresponsive and short-sighted agency operating today"); that BPA wasn't listening to public comment ("I think that these comments everyone is making are falling on deaf ears"); and that the adequacy and intent of the process was questionable ("You have chosen to ignore us until now when you find yourselves in need of our cooperation").

1. <u>Comment</u>: Throughout this whole thing, you do not address what's good for the people of Montana, what's good for the private citizen here. What you're expressing in here are for the welfare of BPA and for the welfare of Montana Power Company. That's hog wash, you better start paying attention to the people that you're hurting with this thing. . . .

Response: BPA's scoping and hearing processes for the Garrison-Spokane Project were designed specifically to incorporate people's feelings in route identification and selection. The route selection and impact identification process attempted to minimize the number of people adversely affected by the proposed line by examining their needs and attitudes from socioeconomic, urban/residential, and esthetic viewpoints.

2. <u>Comment:</u> How will the decision on where the line is to be run be made? Who, exactly, will make the decision? And when will the decision be made?

<u>Response</u>: The primary Federal decisionmaking agencies are the Bonneville Power Administration, U.S. Forest Service, and Bureau of Land Management. The decisions to be made are described briefly in Chapter I of the EIS. About a month after the Final EIS has been filed with the Environmental Protection Agency and distributed to the public (scheduled for March 1983), the Federal decisionmakers will issue a public Record of Decision (scheduled for April 1983). The Record of Decision will carry the signature of the responsible officials of each agency. It will document the decision, specify alternatives considered, identify and discuss factors relevant in making the decision, and state means selected to mitigate and monitor environmental impact.

3. <u>Comment:</u> A number of commentors expressed concern about how citizens could gain input to the decisionmaking process, questioned how public meeting comment would influence the content of the EIS, and questioned whether the comments will really have an impact on the decision.

Response: Public comments have been actively sought on repeated occasions since planning was begun on the project. Opportunities for citizen involvement have included scoping meetings, workshops, open-house information meetings, and public hearings, as well as opportunities to submit written comments (see Chapter IX of Volume I, "Errata"). Information gathered during the scoping process has helped to determine subjects of controversy, siting concerns, and resource concerns. These concerns helped BPA to formulate and analyze the routing alternatives and mitigation measures presented in the draft EIS. Public comment from review of the Draft EIS has influenced the proposal in many ways. Route adjustments, special tower designs, and additional mitigation measures have been added to the projects' alternatives in response to concerns expressed by the public. The information gathered from the public review process will also have an impact on the final decision. All comments are assessed. Responses to comments are documented in this Volume of the final EIS. And the project Record of Decision (to be issued about a month after the final EIS) will discuss how all factors, including public comment, were balanced in reaching a decision.

4. <u>Comment</u>: . . I just encourage you to go away a little bit humble because we realize that you do have a job that you've got to do, but don't be scared to go back to the men that are in charge clear back into Washington and say, "Hey, fellows, you better come out and take a look at some of this. It's easy to push us out there, but they are human and they're what makes this country exist and go."

<u>Response</u>: The interdisciplinary team will ensure that public concerns will be carried forward to the agency officials responsible for making the decisions regarding this proposed transmission line project.

5. <u>Comment</u>: I am disappointed that you did not extend the comment period to allow for review of the State of Montana's decision with regard to the line. My request was logical and should have been granted. I make the further point that your response to me was sloppy. You did not answer my request in a timely fashion, but instead delivered your response to my office one day before the comment deadline, and then only after being requested to do so by my office. The delay is indicative of the attitude BPA has displayed to all Montanans concerned about this project throughout the EIS process.

<u>Response</u>: We considered your suggestion in relation to the agreement made on May 17 with the State of Montana. The agreement provides for State agency and Board review of the Montana portion of the Garrison-Spokane transmission line to determine whether Bonneville Power Administration has complied with the substantive requirements of Montana's Major Facility Siting Act.

We have worked closely with the State agencies in reviewing the public and other comments on the draft EIS, and will be working with individuals and groups on centerline adjustments to mitigate impacts. State requirements for construction activities developed for the ongoing Townsend-Garrison segment will be analyzed for inclusion in the mitigation measures of the final construction specifications for the Garrison-Spokane line.

In light of the extended opportunities for State-BPA coordination and of the longer-than-normal review period ending May 28, 1982, we decided not to extend the draft EIS comment period.

We appreciate your concern that Montanans have the opportunity to consider the State's findings for application to the Garrison-Spokane segment. We believe that the State-BPA agreement and the ongoing work with individuals and groups will provide this opportunity in an atmosphere of closer cooperation between the State and the Bonneville Power Administration.

6. <u>Comment</u>: The plan for environmental studies as revised in April of 1981 called for public workshops to be held in July of 1981 concerning route locations and route evaluations. These workshops were never held in the Garrison-Missoula study area. No scoping meetings were ever planned or held in the area of the southern route of the Flint Creek Valley.

<u>Comment</u>: . . . We never had any scoping. We have one incorporated town in the County that was never allowed to have informational hearings and testimony either.

<u>Response</u>: The Plan for Environmental Studies did call for workshops in July 1981, as part of the public involvement process for route review and evaluation. For several reasons that workshop activity was consolidated into the scoping meeting activity for the Garrison-Missoula part of the study area: 1) the public participation objectives for Phase I - Project Planning and Phase III - Route Identification and Review were similar and partially overlapping; 2) preliminary route locations were known at the time of the scoping meetings; 3) the scoping meetings and workshops would have been scheduled very close together (between late May and July) and, from experience, were not likely to provide much different or supplemental information.

7. <u>Comment</u>: The "Dear Reviewer" letter enclosed with the EIS said our comments and the February 4 meeting comments would be "treated as though they were comments received on the Draft EIS," even though they were made six weeks prior to the publication of the EIS. In a March 25 meeting in Hall, Dan Bisenius called treatment of our comments "a gray area", and Tim Murray tried to suggest that our comments and the meeting were somehow "outside the EIS process.". . The February 4 meeting and comments was not even acknowledged in the Draft EIS. And in a March 16 letter to Granite County Alliance, George Eskridge tries to justify one of these many methodological manipulations in terms of the National Environmental Policy Act. But when challenged in our March 30 letter, he simply grops the NEPA defense in his April 9 letter. Clearly these many varying and formulating methodologies [the apparent indecision on how to treat GCA's comments] leave us confused about BPA's ability or intention to receive public comment.

<u>Response</u>: Comment letters submitted after the close of project scoping but before issuance of the draft EIS have been included with comments from public review of the draft EIS. Comments have been evaluated and are responded to in this Volume of the final EIS. The letters are printed at the end of this Volume (Part VI).

8. <u>Comment</u>: We already have [BPA] rights-of-way through this area here [Rathdrum-Bell]. Why is it necessary to have these meetings here and kind of waste your time?

<u>Response</u>: Public meetings were scheduled throughout the project area to obtain public comment on the environmental impacts of the proposed line. Even though there is an existing right-of-way available between Spokane and Rathdrum, BPA wanted to seek comments on any additional effects of another line within the right-of-way easement.

9. <u>Comment</u>: I also asked at that time why no scoping meetings were to be held in Mineral County. I had attended some scoping meetings in Missoula County. Of course, the whole point of that matter was we're just little fish, and that's the reason why we didn't qualify for that, so what I'm saying is you've got this . . . draft EIS which has in it supplemental information that came from scoping sessions in areas like Missoula, but if you looked through this carefully you wouldn't find anything related to Mineral County in that.

<u>Response</u>: As listed in Appendix A, "Methodology" (Attachment 1), for the initial project, the Hot Springs-Bell Supplement (1979-April 1981) study area (of which Mineral County was a part), scoping meetings were held only in Coeur d'Alene, Idaho, and Missoula, Montana (September 1979). Subsequently, in March 1980, eight workshops were held across the study area, including one in Superior, Mineral County on March 26, 1980. When the scope of the project and the study area were expanded in April of 1981, more scoping meetings were held in the new area (May 1981). These meetings were followed by eight "open houses" in the original study area in June 1981. An open house was held in Superior, Mineral County on June 23, 1981. Both meetings were conducted to hear concerns of Mineral County residents.

10. <u>Comment</u>: Why can't hearings be scheduled for towns like Hall, Alberton, or Huson? Residents of these areas may be affected by the project.

<u>Response</u>: Fourteen public hearings were held throughout the project area. It was not possible to have a hearing in every community in the region. The locations were selected to provide everyone in the project study area a reasonable opportunity to attend a meeting. In addition to the public meetings, BPA widely advertised and announced that written comment was welcome throughout the comment period. BPA also provided toll-free phone lines to answer questions or forward information on the project. Even though meetings couldn't be held in every town that requested one, an effort was made to provide other convenient avenues for information or comment. 11. <u>Comment</u>: Why then can't we have a meeting with the decisionmakers; why do we have to go through so many channels, not know whether your comments are going to the right people?

<u>Comment</u>: I would like to see a real change in Federal agencies to where the individual with whom they deal has input and has meaningful input . . . you have [said] that these transcripts will be available, and, yes, I believe they will be available, but I also believe that they won't be read. They won't be paying any attention to it in the least by anybody that makes the decision. That's why I asked to have Peter Johnson here tonight, he is the man that ultimately this decision lies with . . . see, why should I believe anything we say is really going to have any input in your organization? It's darn frustrating out here. We come out here; we ask you; you can't give us answers. You say you can't speak for the Department. Who can, and why aren't they here?

<u>Response</u>: The decisionmakers have delegated the responsibility for conducting the environmental studies and project hearings to the interagency project team under the direction of the project manager. Although the decisionmakers were unable to attend the public review meetings, the project manager and representatives of the decisionmaking agencies dia participate in nearly all of the sessions. The project team has been directed to rigorously assess and evaluate all comments received from the review and channel its findings to those who will make the decisions. We are doing so.

12. <u>Comment</u>: . . . Instead of a summary when you print the comments, print the comments word for word. You put out lots of stuff. When you set out the draft a few more pages, let's have all the comments from St. Regis word for word, not summation and just the way it's said here tonight.

Response: While the complete public comment record is available for review at BPA, it is not economically or analytically practical to reprint it in its entirety in the final EIS. The eleven-hundred-plus pages of public meeting transcripts are summarized for the final EIS. All comment letters on the draft EIS are reprinted verbatim. Comments from this voluminous public comment record have been assessed and considered individually and collectively. Responses to these comments are the primary subject of this Volume (II) of the final EIS.

13. <u>Comment</u>: I see one [EIS] sitting right nere. The problem is that two of those, as far as I know, came into St. Regis. I haven't read either one of them. I didn't have access to them. Tonight is the night for comment on this Draft EIS, not a month from now or not some other time, it's tonight. We didn't have the information. We have no way of evaluating what you did because it isn't in the bulk of the material that everybody else around here received. We [only] got Summaries.

Response: EIS Summaries were broadly distributed to individuals who had not requested a complete EIS. However, the cover letter did list toll-free phone lines where copies could be requested. The Summary itself contained a list of libraries and government offices where complete copies of the document were available. Comments could be presented either at the public meetings or in writing any time during the review period.

14. <u>Comment</u>: And speaking of homework, why if the BPA has worked very hard at notifying landowners in the Maxville area, was there a woman finding out ownerships less than 3 weeks ago at the courthouse in Philipsburg? I thought all this was done before decisions like what or what not is the better route.

<u>Response</u>: Printed advertisements, radio announcements, and direct mailing were used to notify people who may be potentially affected by the project. In addition, the project mailing list is continuously updated. In the instance mentioned above, landowner records were probably being reviewed as part of that update. Knowledge of all landowner identities is not needed for the interdisciplinary team to conclude its analysis.

15. Comment: Comparison of the newspaper ads May 14, 1981, to ad dated April 8, 1982. Maps are vague . . . April 82's map, although an improvement over May's, shows Maxville and Philipsburg, does not show Hall. And the scale that the map is could have the line going anywere north of Maxville when we were under the impression that it passes over the top of this small community.

<u>Response</u>: Maps used in the newspaper advertisements were intended to show general information accompanied by text describing the project review activity taking place and the person to contact for more detailed information (including detailed reference maps if desired). The route in question passes slightly north of the community of Maxville.

16. <u>Comment</u>: BPA, in response to inquiry, has provided no evidence that it tried to contact any landowners south of Hall other than two residences out of thirty-eight. . . In the EIS, it tells of community meetings in the Maxville area with Maxville residents and the BPA on July 7, 1981, to discuss the transmission line routing through this area. And this is a direct quote from the EIS statement, Appendix A, when asked the names of residents who attended this meeting and the Alliance was told it was confidential. "Residents" means several, not one or two. No one else knew of this meeting other than the BPA itself and a few of the BPA's own choosing.

<u>Response</u>: In response to a request made just after the DEIS was issued, BPA requested permission from the people attending this July 7 meeting to release their names. That information was then included in an April 9, 1982, letter from George Eskridge to Lee Tavenner of the Granite County Alliance.

17. <u>Comment</u>: . . . when you select a final route among the three that you're talking about, for example. Will there be any opportunity then for public input or would construction be started?

<u>Response</u>: The proposed route is identified in the final EIS. Although there is no formal public review period on this document, written comments may be submitted to BPA. These comments would be available to the decisionmakers who will prepare a Record of Decision on the project about one month after the final EIS is distributed and filed with the U.S. Environmental Protection Agency. 18. <u>Comment</u>: If this process of public participation is to be meaningful and not just political wind, please evaluate and address all comments submitted to BPA both oral and written.

<u>Response</u>: All oral and written comments were evaluated and are addressed either on an individual or collective basis in this document, as specified in CEQ regulation 40 CFR 1503.4.

19. <u>Comment</u>: You should notify all people living within one mile of each of the proposed corridors in writing so that everyone is fully aware that they would possibly be confronted by these monstrous power lines.

<u>Response</u>: Researchers visited each of the county records offices to try to identify landowners along the corridors of each of the major transmission alternatives and to include them on our mailing list. We do continue to get some letters back whenever we make a mailing. It is difficult to determine whether that is because there are errors in the county records or in our records. However, we are continuing to try to find all the landowners potentially affected by the project, to make them aware of the project via a powerline newsletter.

20. <u>Comment</u>: Why didn't you spend time going over the EIS draft before you published it, explain it to the people before they respond before the deadline.

<u>Response</u>: The draft EIS was distributed over 3 weeks before the start of public review meetings. It was written in a standardized format specified by the Council on Environmental Quality. The document includes a summary, table of contents, index, list of references, and appendices to ease review and minimize the need to explain the EIS to people before receiving comment.

21. <u>Comment</u>: Would it be the same impact of a thousand people? If a thousand people write one letter or a thousand people signed one letter, would that have the same impact as a thousand letters?

<u>Response</u>: The subject of a commentor's concern is what we focus on so that we may address and respond to that concern. The number of people making a comment does give us additional information on how strongly a concern is felt.

22. <u>Comment</u>: Bonneville has taken a number of steps over the past year to make its process more responsive and its people more available to the public. Nevertheless, it is essential that the final environmental impact statement show clearly and specifically how each of the local concerns and ideas has been addressed.

<u>Response</u>: In Volume II (this Volume) of the final EIS, a substantial part of the discussion is devoted to geographic areas of concern (Part IV). This was done to allow more specific response to local concerns as you suggest.

23. <u>Comment</u>: Bonneville should closely review all local initiatives and proposals for center line routing. I am particularly concerned about reports

from several affected communities that local concerns are not being considered adequately. I will take this opportunity to make clear for the decision record that especially with regard to the Maxville, Miller Creek, St. Regis and Thompson Falls areas, my repeated requests for more and improved meetings between local residents and Bonneville personnel have met with only limited success. Further, I have had repeated indications that Bonneville has not, to date, responded to particular routing ideas and problems raised by local residents.

<u>Response</u>: The final EIS devotes substantial attention to addressing local geographic concerns as you have suggested. Part IV of Volume II contains an assessment of comments from each locale you mention. BPA has met and will continue to meet with local residents and community groups on request.

24. Comment: BPA representative, George Eskridge, at a public meeting in St. Regis, told us the BPA really wasn't interested in the people of Mineral County's opinion, economic or environmental future nor that the property owners didn't want the lines running through their property; the only impact the BPA is tuned into is the political impact.

<u>Response</u>: The comment is incorrectly attributed to Mr. Eskridge. (The assertion may have been made by a member of the public.) Public comment, economic, and environmental considerations will be vital factors in decisionmaking on the project.

### II. G. 2 Process/Methodology

The comments on process and methodology posed questions and criticisms on a wide variety of subjects. Some commentors on the EIS stated that it identified controversies but not impacts, did not present the methodology in enough detail to be easily understood, and that it did not present enough information to justify route ranking scores in Appendix A. Other commentors stated that the EIS did not disclose human impacts or present enough back-up data to justify route comparisons.

More specifically, commentors stated that while several resources such as soils, elevation, forests, and streams had been considered several times, the human population had only been considered once. Others telt that the identification and weighting of impacts was arbitrary, random, and/or untraceable. One commentor stated that communities and residences had not been counted until after route selections were made; another one felt that potential effects of mitigation measures had not been considered in the route selection process.

Other commentors on process/methodology stated that inaccuracies existed in the agricultural, undeveloped/subdivided land, and other maps. Some comments questioned the accuracy of stream crossing numbers and soils maps and asked why a population density map had not been prepared.

Commentors on the socioeconomic analysis stated that it should have given more consideration to crossings of flat, developable land, and that it should not

have been "lumped" together with other resource areas. Other commentors questioned how views of local residents were incorporated into the socioeconomic analysis.

The study process is discussed in general in Chapter II of Volume I and more specifically in Appendix A. Additional responses are provided below.

1. <u>Comment</u>: All route alternatives should be compared before the Final EIS. This requires another Draft EIS. We asked that such a comparison be included in the draft document.

Response: All route alternatives are compared in the EIS. The scoping process was used to define a study area within which a complete range of alternative routes could be defined and evaluated. These routes are evaluated in Chapter IV of Volume I in the text, tables, and maps. However, only those alternatives determined through a comparative evaluation to have the least adverse environmental impact for each alternative plan of service were carried forward to the final EIS. For further discussion of this question, see Parts II. B Other Alternatives and II. D Legal Concerns.

2. <u>Comment</u>: Goal number five, identify with the Washington Water Power Company an electrical plan. What does this have to do with it?

<u>Response</u>: BPA and the Washington Water Power Company have proposed transmission projects that may be built in the same area. By evaluating both projects at the same time, a decision can be reached that avoids unnecessary duplication of facilities and minimizes environmental harm.

3. <u>Comment</u>: The EIS does not disclose effects of the project on the human environment. It merely lists them as areas of controversy. Table 2.3, Ranking Summary, and Tables 2.4-2.6, Advantages-Disadvantages, do not indicate the extent or importance of the impacts. For example, the ranks of l=least to 3=most are misleading as they don't reflect where plans might be very close or very far apart.

<u>Response</u>: Discussions of impacts become more detailed the farther one reads into the EIS. The "areas of controversy" discussion (in the SUMMARY) is intended only to highlight issues that are not agreed upon--those for which no ready answer exists. For some, the issue may well be whether there is an impact (i.e., health and safety). For others the question is how to weigh one effect against another in the overall comparison.

Chapter II: COMPARISON OF ALTERNATIVES discusses impacts for combinations of segments into best alternative routes. The focus of this chapter is to compare the effects of one route with those of the others in a complete and meaningful manner.

Chapter IV: ENVIRONMENTAL CONSEQUENCES details both general and particularly noteworthy effects of every possible variation of the project. Magnitude, intensity, and significance of impacts for each resource along each segment

are covered in the text and tables. For instance, table 4.3 - Resource Considerations provides hard data (miles, acres, numbers) about resources encountered. Table 4.2 treats impact sources, duration, and likelihood.

The Route Ranking Summary and the Advantages/Disadvantages tables were not intended to indicate the extent, importance or location of impacts, but were designed to help make those comparisons. The terms "1," "2," and "3", as well as "most"/"least" are relative measures derived from the detailed analysis in Chapter IV. Thus, table 2.3 - Environmental Ranking Summary is intended to show relative ranks among routes, not to show the intervals separating them. From this table, one may see which plan best satisfies the most evaluation criteria. Actual differences among plans and information on the ranges of these differences are characterized in the text and in tables 2.1, 2.2, 2.4, 2.5 and 2.6.

4. <u>Comment</u>: Access roads were considered in four separate "scoring" categories on the route ranking option forms [used by the resource analysts to compare routes--see Appendix A]. Other data categories, such as erosion, elevation, forestry and stream crossings, were used multiple times. Human population was only used once, showing technical bias at the expense of human consideration.

<u>Response</u>: Access roads were treated as a cause of impact, not as a data item. They are important because they affect wildlife habitat, erosion, long-term forest productivity and short-term agricultural production; increase access to recreation or cultural sites; create inconvenience effects associated with use of roads and gates on private land and attendant social effects; cause visual scarring; and increase cost considerations. Many of these are strong human concerns.

Furthermore, human population was a major variable in the Urban-Residential, Socioeconomic, and Esthetics resource topics. In the ranking summary (table 2.3), which compares the plans against ten important criteria, two of the ten (la and 2) relate directly to human population. Four more evaluate related human considerations having to do with land use or economics (lb, lc), esthetics (3), and (4) cultural resources. Furthermore, examination of the environmentally sensitive areas criterion (6) reveals that virtually every area categorized is one where sensitive human population conditions prevail.

5. <u>Comment</u>: The statistics tend to be encyclopedic and not analytical. For example, the clearance of timber is indicated as a hundred twenty-five feet wide. Acreage was computed on the total linear length of the line where it crosses through timber areas. Care and placement of the lines can greatly and very materially reduce this acreage. Also, there are distinct differences in line impacts. Some impacts need to be measured at tower sites only whereas others must be measured along the entire route. These should be reanalyzed and put into perspective. Additionally, the general mitigation measures are mentioned but are not brought into the analysis. Basically we recommend a proper analysis of the actual impacts of this line.

Response: The data presented in the Resource Considerations tables (tables 2.2, 4.3) are not merely a listing of resource information. They were intended to show the range of potential impact for selected resources, as the first step in the analysis of impact. After a site-specific examination of the routes themselves, resource specialists assigned meaning to the numbers by estimating the actual nature, level, intensity, and probability of impact.

A site-specific examination would involve close estimation of a number of factors; for forest clearing, for instance, the topography, type of vegetation, and growth rate all entered in. Although towers are placed to minimize clearing, an average of 125 feet of timber would have to be cleared. Some locations would require more clearing, others less. The mileage figures used in the tables and text reflect this average.

Different activities do result in distinctly different impacts. Such differences, an important part of each analyst's impact evaluation, are reflected generally in table 4.2 and in the generic impact discussion and, for specific impacts, in the section discussions in Chapter IV (Volume I).

Mitigation measures and their effects were integral parts of the analysis as well. The impacts discussed in Chapters II and IV (Volume I) are considered to be the actual effects which would occur should the facilities be built. Although standard BPA mitigation measures were assumed for many resources, these effects would occur regardless of mitigation. The mitigation measures discussed separately in Chapter II and at the end of the section discussion in Chapter IV could affect the degree of intensity of many impacts.

6. <u>Comment</u>: The segment resource data are not used directly for any route comparisons. These resource numbers are reviewed and interpreted by judgment calls. The identification of significant impacts and their corresponding scoring weights is thus arbitrary, random, and very unreasonably weighted.

<u>Response</u>: The segment-by-segment data measurements are general indicators of potential impact. They are not, by themselves, a complete or accurate analysis. Impact assessment, by definition, requires judgment and interpretation, in this case by experienced professional resource specialists (see Chapter V of the the EIS, LIST OF PREPARERS). Each analyst assessed the nature, likelihood, timing, duration, intensity and significance of potential impacts according to a consistent set of assumptions derived from his or her knowledge of the resource, the data, and the study area. These standards, documented in the <u>Introduction of Topics</u> section of Chapter IV, within the section discussions themselves, and in Appendix A, Attachment 2, were applied by each specialist thoroughly and consistently for the entire project.

7. <u>Comment</u>: The fact remains that the public doesn't get to comment on the economic or, I believe you said, not engineering but economic considerations. I suppose some people are engineers and would like to make a comment when some engineers say that isn't feasible. It seems to me that our engineer has a right to say, "well, certainly that's feasible." Why isn't that information made public?

<u>Response</u>: One goal of the environmental impact statement process is to detail the project's effects on the environment. The EIS is not intended to contain detailed technical and economic studies that may be used in the decisionmaking process. It does, however, contain summary cost and technical data helpful in characterizing the alternatives and their impacts. The EIS (Chapter I) also lists as needs and purposes those considerations in addition to environmental quality that are likely to be relevant and important to a decision.

8. <u>Comment</u>: An adequate level of review is possible only after very difficult and time consuming study of materials (i.e., segment resource data) not readily available in the EIS or appendixes, and is not fairly summarized elsewhere. The methodology is designed to discourage review and comment and to make substantive comments on EIS material almost impossible.

Response: The material in the EIS, including the appendices and map volume, adequately details general or "average" impacts for each resource along the routes, discloses areas where noteworthy or more serious effects would occur, and indicates the environmentally preferred option for each plan. This satisfies the goal of the environmental analysis within the page limits set by the Council on Environmental Quality. Given the size and complexity of this study area, and the scope of the issues under consideration, the EIS is obviously not a brief and simple document. We have attempted to present the results and methods in a manner as simple and straightforward as possible. For the reviewer interested in greater detail about a specific area, BPA has made virtually all of the analysis products available at various offices. This includes segment-by-segment data summaries, large-scale resource maps, and aerial photography.

9. <u>Comment</u>: The corridor impact maps are developed by the analysts applying their judgments to a matrix scheme to the resource maps. The matrix scheme, in turn, is an application of the analyst's judgment of level of impact of various combined resources. There are no measurements in either the matrixes or their application to the maps. The entire impact rating is an unstructured judgment call of the analysts, and as such, is virtually untraceable for review.

<u>Response</u>: Impact assessment, by definition, requires judgment and interpretation. Each professional resource specialist (see Chapter V of Volume I: LIST OF PREPARERS) assessed the nature, likelihood, timing, duration, intensity and significance of potential impacts according to a consistent set of assumptions derived from his or her knowledge of the resource, the data, and the study area.

These standards were applied by each specialist thoroughly and consistently for the entire project and were used to develop the matrixes referred to in the comment. The matrixes are models which show relative values of resource data in the study area. Each matrix value is derived from the analyst's interpretation of the nature and significance of the resources and their sensitivity to impact. The matrix is not used to measure impacts along linear routes. The terms which were used--Very High (VH), High (H), Moderate (M) and Low (L)--are relative values which correlate to specific impact possibilities. The assumptions for these terms for each resource are also documented in Appendix A, Attachment 2 - Location Factors.

10. <u>Comment</u>: The development of further data on any particular segment is dependent upon its being a part of a two-segment comparison. If no alternative segment is identified for comparison, the data collection process stops on this segment and most of the relevant impact data for the segment is not gathered. Some further data is gathered on the impact summary forms but only impacts deemed "noteworthy" at the wide-open discretion of the impact summary form analyst is even mentioned here. Clearly errors of omission are not available for review here.

<u>Response</u>: Data was collected first for 33 data items for the entire study area. This information was used to define corridors and help locate routes. Then each resource analyst identified and collected additional data items for his or her route impact resource analysis. The same level of information was collected for the entire route network, and all segments were field reviewed, regardless of whether a segment was part of a two-segment comparison. The impact summary forms referenced in the comment were used to synthesize all existing information on noteworthy impacts in order to write the Draft EIS most clearly and succinctly. These forms contain no "additional" data. All impacts identified in the analysis have been treated here under either part 1 of Chapter IV (general impacts) or part 2 (more serious or noteworthy impacts). As directed by the Council on Environmental Quality's regulations, the analysis focused on disclosing the project's more important consequences.

11. <u>Comment</u>: Route comparison scores summaries are shown in Appendix A but without any site-specific explanation or justification of these scores. The scores are based on analysts' judgments that are noted in route option ranking forms.

<u>Response</u>: As noted in the comment, these are <u>summaries</u> of route comparisons made during involved and lengthy interdisciplinary team workshops. For each comparison, each analyst characterized the nature and occurrence of impacts on his particular resource, ranked the routes, and stated the reasons for the rankings. The overall ranks represent the consensus of the team, following comprehensive discussion of all resource tradeoffs. The best-ranked plan became the environmentally preferred route. Departures from this route would be considered to have higher impact. Except for segments eliminated from further consideration, information on nature and significance of impacts is presented for all route segments considered. (See Chapter IV: ENVIRONMENTAL CONSEQUENCES.)

12. <u>Comment</u>: Map volume, Appendix C, Hot Springs-Bell study area, wildlife: big game sensitive habitat; wildlife: Peregrine Falcon; wildlife: Bald Eagle; wildlife: Osprey; wildlife: Grizzly Bear; wildlife: waterfowl, all fail to mention the Bureau of Indian Affairs, Wildlife Branch, as a source of information for on or adjacent to the Flathead Reservation resources. <u>Response</u>: Although the data maps provided by the BIA, Wildlife Branch, were used in compiling the project data base, the source designation was inadvertently omitted from the maps. This information has been added to an errata sheet.

13. <u>Comment:</u> . . . We are skeptical about the agencies' ability to present a thorough, objective, and accurate assessment of the project . . . . part of the problem with the BPA producing an unbiased analysis is that the BPA is acting in this instance, as the judge, jury, and prosecuting attorney. BPA is overseeing BPA's work. Due to the self-financing nature of the BPA, careful congressional scrutiny appears to be sorely lacking. Its role as the lead agency in the Colstrip EIS, while it was, at the same time, a proponent of the project, is a clear example of the problem. BPA functions as an independent Federal agency that is responsible to no one but itselt.

<u>Comment</u>: How does BPA prevent bias from slipping into the EIS when it's fairly clear that BPA wants to put in a power line?

<u>Response</u>: A well-defined system of checks and balances operates to insure that BPA conducts and presents objective and accurate assessment. First of all, BPA is ultimately responsible for the environmental consequences of all its programs and projects. As part of our mission, we are charged to assure the region an adequate, economical, reliable, efficient and environmentally acceptable power supply. Also, the National Environmental Policy Act directs us to perform accurate and complete analyses and disclose all significant environmental effects of our programs and projects. Where a project would cross Federal land, land management agencies (i.e., the Forest Service and BLM) have to be satisfied that this has occurred before they will grant a permit to cross the land. BPA is also subject to other appropriate laws and regulations.

BPA and other agencies cooperating on the EIS have followed a mutually agreed on plan for environmental studies to insure a systematic evaluation. The work has been performed by reputable professionals whose responsibilities and credentials are listed in Volume I. Work is periodically reviewed by agency officials for comment and direction. The work is subject to critical review and comment by the public. Additionally, the method followed in doing the studies is published as an Appendix to the EIS titled Appendix A, "Methodology."

BPA, in following an open, public, systematic, and well-documented planning process, has endeavored to control and eliminate bias, slanting, or prejudicing of information and to demonstrate accountability for its actions.

14. <u>Comment</u>: Other technical statements submitted in all these hearings, both orally and written, with different conclusions from the BPA should be investigated and addressed in the final EIS. The authors should note their sources and any conflicting views, studies, or findings.

<u>Response</u>: This volume (Volume II: Comment/Response) analyzes and responds to each comment and conclusion drawn by all commentors on the draft EIS. Changes are also made, where pertinent, in the EIS itself (Volume I).

15. <u>Comment</u>: Affiliation for all consultants engaged in the preparation of the EIS should be noted--i.e., BPA quoting BPA employees on health and safety effects is less than truly believable.

<u>Response</u>: The training and background for every resource specialist who helped to prepare this document is presented in Chapter V: LIST OF PREPARERS. As discussed in Chapter IV of Volume I and in Part II. H of this Volume, information on health effects currently reflects all research being performed in the world.

The discussion of safety concerns reflects BPA policy developed after years of operating thousands of miles of transmission line by specialists recognized as experts in this field. Most of this information was derived from pamphlets and brochures about behavior near powerlines which BPA updates periodically and widely distributes to the public.

16. <u>Comment</u>: Flatter land is generally more valuable and more suitable for human use. Steep ground is less likely to be used by people for future development. The BPA methodology does not consider this critical socioeconomic factor. Rather, methodology considers only the opposite consideration for technical construction considerations. The powerline should be placed on less valuable, steeper ground not only for human use of the flatter ground later, but because long-term land use costs will far outweigh short-term construction costs. Any socioeconomic consideration that does not take account of long-term land use cost impacts is seriously lacking.

<u>Response</u>: The concerns above were captured in project scoping meetings and workshops. They are considered under the scoping issue called "Use of Public vs. Private Land" (see Chapter I, Volume I) and in Part II. I of this Volume. As with other human development, it is easier and less expensive to build a transmission line on flatter ground.

Although the socioeconomic considerations did not include a comparison between flat land and steep ground, the socioeconomic route selection process assessed the impacts of crossing private property, dispersed development, and undeveloped/subdivided land, three characteristics which serve as excellent measures for the land's potential for future human use.

17. <u>Comment</u>: I think the socioeconomic factors are traditionally separated out on EIS work. I think lumping them together [in with "traditional" natural resources] is causing more problems than it's solving.

Response: A complete description of the consideration of socioeconomic factors considered is available in Appendix D - "Social and Economic Considerations." These factors were considered along with several other resource factors in the interdisciplinary route ranking process.

In Volume I, socioeconomic factors are discussed alone in Chapter IV. However, because socioeconomic factors are closely related with several other resource topics (such as urban/residential, agriculture, and recreation), they were discussed and considered along with several other topics in the EIS. The interaction that took place between the socioeconomic team members and those of other resource topics was very important in the overall impact identification and route ranking processes, as it tended to strengthen the analysis of each individual resource area.

18. Comment: The socioeconomic analysis presented views of individuals that could be affected by the line, but it did not specify those views held by residents of any particular geographic area. How did the socioeconomic analysis incorporate the views of local residents [and particularly those of Mineral County residents]? When was the study conducted and who did they contact in Mineral County? Who conducted the socioeconomic study?

<u>Response</u>: The socioeconomic study of the proposed transmission line was conducted by Mountain West Research, a private firm located in Billings, Montana since 1974. Under contract to BPA, Mountain West evaluated the proposed line's social and economic effects on local residents. The analysis included 52 formal interviews and more than a hundred informal interviews with landowners, residents, and government and private officials in a nine-county, three-state study area. The results of these interviews are summarized in Appendix D, "Social and Economic Considerations."

As noted in Appendix D, the interviews were organized around potential effects on different types of land uses (farming, ranching, residential, forest, etc.). The results of these interviews revealed a highly consistent set of expected impacts for each type of land use. Hence, the socioeconomic analysts assumed that the impacts on a mile of irrigated farmland would be about the same, whether the land was in Mineral or Missoula County. The analysts then gave more preference to lines which avoided sensitive residential, agricultural, and recreational areas. This approach was highly objective and avoided a more subjective approach which could have "pitted" neighbor against neighbor.

Several landowners, real estate agents, and government officials in St. Regis and Superior were interviewed. However, because these individuals were assured of confidentiality at the time of the interviews, their names cannot be released.

19. <u>Comment</u>: There are also sections in the EIS map volume on big game habitat, peregrine falcons, grizzly bears, waterfowl, but there were no maps of human population density.

<u>Response</u>: Human population density maps were not needed because existing data maps showing towns, communities, and residences displayed the actual distribution of human population and could be used to make more accurate impact predictions. Towns and communities are indicated as urban/residential and dispersed development land uses on figure 4.3 - Land Use/Land Cover (also included in the map volume). Although the scale of this map is too small to reflect locations of individual residences, such residences were mapped at the larger USGS quadrangle scale for use in route location and impact assessment. Other maps which reflect human population concerns and which were used in the impact analysis include EIS figures 4.2 - Land Ownership and 4.10 - Viewer

Sensitivity, and the Proposed Development, Land Use Constraints and Acquisition Cost maps in the Map Volume (Appendix C).

20. <u>Comment</u>: There are problems with many of the maps. The data base maps are of such small scale and without section lines such that identification of known areas is extremely difficult.

<u>Response</u>: There are limitations on the amount of detail that can be shown at the scale of the EIS. The EIS and map volume maps provide sufficient detail to determine approximate locations of most geographic features. They are not intended to provide pinpoint locational data but rather to show resource patterns over a 9,000 square mile study area. More detailed maps and air photos have been and will continue to be made available at the BPA Transmission Coordination Office in Missoula, Montana.

21. <u>Comment</u>: It says that the Taft route has the fewest stream crossings. How many were there in the other route and what are you talking about when you say stream crossing?

<u>Response</u>: The Taft route crosses the highest number of streams. The number of streams crossed by a route is a general index of the amount of potential disturbance on water quality, aquatic wildlife and streamside vegetation from clearing for right-of-way and access roads. Initial stream counts were made using the Hydrology-Perennial Streams and Rivers Map (see Map Volume), which was based on the USGS 502 series 1:250,000 scale maps and tallied in tables 2.4 - 2.7.

A revised count based on USGS 7.5- and 15-minute quadrangles shows the stream counts for the top-ranked route in each plan to be: Plan A - 77; Plan B - 100; Plan C - 106. The EIS is being revised accordingly.

22. Comment: Many of the landowners shown having undeveloped subdivided land don't know anything about their land being subdivided.

<u>Response</u>: The map reflects recent activities in subdividing parcels of land in order to predict where future development might occur. The map is based on county subdivision, certificate of survey, and deed records. It does exaggerate the extent of the resource because information was mapped by quarter-section. That is, wherever any subdivided parcels occurred, the entire quarter-section was mapped and counted in that category, even though the corridor itself might miss the particular subdivided parcel.

The maps, nonetheless, present a good general picture of the extent and distribution of undeveloped subdivided land across the study area. Although it was impossible to field check every parcel in the study area, most parcels of undeveloped subdivided land crossed by routes were verified for the impact analysis.

23. <u>Comment</u>: Maps showing erosion susceptibility and mass movement potential are incorrect and do not reflect the actual potential. What are your sources for these maps?

<u>Response</u>: The main sources for these maps are the 1976 USFS map and publication "Land Suitability Pattern for Electric Transmission Lines" and C.P. Ross' Geologic Map of Idaho. General U.S. Forest Service mapping units were combined into similar classes to show general levels of erosion susceptibility and mass movement potential. Data reflected in the USFS mapping units refer particularly to road cutbanks and other road cut and fill areas. The interdisciplinary team was aware of the limitation of this generalized information for detailed analysis, but determined the maps to be helpful in the regional analysis. These maps were combined with other data (i.e., slope, elevation) and used to identify broad corridors. More detailed information--including field reconnaissance and air photo interpretation--was collected at the route-specific level to supplement these maps for route impact analysis.

24. <u>Comment</u>: The agriculture maps shows no irrigation on Tarkio Flats at all, and there has been since '73.

Response: The map document entitled "An Atlas of Water Resources in Montana by Hydrologic Basins," Inventory Series Report No. 11, Montana Water Resources Board, shows irrigated lands in Montana as of approximately 1970. This document depicts irrigated lands in small areas along valleys of tributary streams flowing into the Clark Fork River between Tarkio and Lozeau. These irrigated lands did not appear on maps for agricultural lands in the draft EIS, apparently as a printing error. No routing alternative comes within 3-4 miles of these irrigated lands, so their existence would not influence results of the environmental analysis. New irrigated lands in the Tarkio area also would not be directly affected by the proposed routing alternatives.

25. <u>Comment</u>: On page IV-54, segments of the Taft plan are listed. Segment 148 (the Ninemile Valley) is not included. Yet in the body of the text, segment 148 is compared and evaluated using the same criteria as applied to the other listed segments of the Taft plan.

<u>Response</u>: Segment 148 was inadvertently omitted from the list of other segments also part of Plan C. It is included on table 4.3 and in Attachment 3 of Appendix A. This omission has been corrected in the final EIS.

26. <u>Comment</u>: Technical bias. Segment identification within corridors was determined primarily under direction of the siting engineer whose expertise is civil engineering rather than environmental studies. Furthermore, the decision of whether or not to identify alternate route segments for comparison purposes was under the direction of the same siting engineer. Although the engineer was supposed to consult with other team members in this segment's identification, no explanation, justification, record, tables, notes or other documentatives or lack of segment alternatives. . . This clearly leaves the segment identification process at the direct mercy of extreme technical bias without any possible review.

<u>Response</u>: The initial routes were placed in the least-impact areas, based on analysis of available available resource data and field information. Where multiple segments were located across an area, it was because no one segment was the best overall choice environmentally. Generally, where only one route alternative was located across an area, it was because that location was determined to be the best overall. Route options were identified from information supplied by members of a team whose individuals have extensive environmental backgrounds (see Chapter V, LIST OF PREPARERS). Route locations were studied and analyzed by all team members. The siting specialist is part of this team. During public review, additional information and intense public concern led to the identification of alternative routes in certain sensitive areas. Four such alternatives were considered by the entire team in comparison to the original route locations (see in this Volume, parts IV. B, E, I, and N.).

27. <u>Comment</u>: Indian concerns have been listed in the draft environmental impact statement, however, saying that they were given a fair presentation would not be accurate. This is especially true in the several instances where the draft refers to the "potential difficulty of crossing the Flathead Reservation," as opposed to saying, "the concerns of the Confederated Salish and Kootenai Tribes relating to health and safety issues, jurisdiction, legal issues, environmental issues, social and economic considerations, etc.," with a presentation and discussion of each. The Confederated Salish and Kootenai Tribal Council should not be perceived as a problem to be dealt with, but given the respect and consideration due to the governing body of the tribal membership, the tribal homeland and of all the resources found there.

<u>Response</u>: BPA, aware of the quasi-sovereign status of Tribal governments, held numerous meetings with the Tribal Council of the Confederated Salish and Kootenai Tribes throughout the EIS process. Environmental, social, and economic issues raised by the Tribes are consistent with issues raised by non-Indian commentors. Thus, the term "potential difficulty of crossing the Flathead Reservation," as used in the draft EIS, refers only to uncertainty surrounding the legal status of BPA's existing right-of-way across the reservation. See Part II. D. 3 for a detailed response to the right-of-way issue.

28. <u>Comment</u>: Not considering such vital population data as actual number of people within a half mile of the line is evidence that the study is flawed.

<u>Response</u>: An objective of the EIS is to predict changes (impacts) that may occur in local populations and communities as a result of building the proposed transmission line. Even if it had been practical to conduct a census within the area one-half mile to either side of each alternative route, this was not necessary. It was much more direct to consider the residences and other settled areas (i.e. communities) in this zone. But knowing data about numbers of people--whether actual population numbers or counts of dwellings and settlements--did not complete the analysis of human impact. Other factors, such as landform and vegetative screening, needed to be considered to ascertain actual impact. The number of residences within one-half mile of the line was considered in the route comparisons. (Also see responses in Parts II. G. 3 and III. A, and other responses in this section.) 29. <u>Comment</u>: There are several areas that deserve further study before final location is determined. These include Maxville, Rock Creek, Blue Mountain and St. Regis, all in Montana. We [U.S. Forest Service] would be happy to participate in the analyses or studies since they would affect national forest system lands.

<u>Response</u>: Further joint route location review and study in the areas mentioned has taken place. Specific resource concerns and resolution of the studies are detailed in Part IV of this Volume, GEOGRAPHIC AREAS OF CONCERN.

## II. G. 3 Evaluation Criteria

Many people had comments about the factors used to site and evaluate the alternative routes. Some commentors on evaluation criteria addressed the weighting of resource concerns and the justification of the Taft Route as being "environmentally preferred."

Many asked how weights were attached to resource concerns to ensure fair application of the evaluation criteria. Others stated that the evaluation critieria underemphasized human and land use concerns at the expense of natural resource concerns.

Commentors on the Taft Route asked how it could be called "environmentally preferred" when its impacts on wildlife, forestry, vegetation, soils, and water were higher than the impacts of other routes. Several stated the Taft route had simply been routed through an area that didn't have enough political clout to do anything about it. Others stated that the Taft route should be abandoned in favor of a route that makes more use of existing corridors where people are "used to" the effects of a transmission line.

1. <u>Comment</u>: How are weights or values attached to the various evaluation factors so that the results are fair?

<u>Response</u>: Impacts within each resource topic were rated against each other to determine how important and how severe impacts would be as a result of building the line. Each analyst used information on impact sensitivity and probability in making these assessments. Impacts among different resource topics were not compared or weighted. This was done to minimize the possibility of favoring one interest group over another or of affecting a regionally or nationally important resource considered locally not to be significant. In addition, the interdisciplinary team recognized that society's values in Western Montana may not be those of Northern Idaho, or of Eastern Washington. The system of equal weighting was used to eliminate a sway or bias of special interests.

That system also fostered group discussion and interaction among team resource and regional specialists so that they could arrive at consensus in evaluating impacts and alternatives. This method did not rely solely on an abstract numerical process (weighting) that would dominate the analysis and therefore the findings. Instead, it focused on accurately depicting the effects of the project in specific areas, particularly where multiple resource concerns overlap, and it relied upon established group procedures to seek out and reflect the wide range of values and concerns with which analysis must deal.

2. <u>Comment</u>: Human population, land use and socioeconomic concerns have been downplayed and underemphasized in the analysis and comparison of alternatives in favor of natural resource concerns. These include visual, urban, residential, health and safety, social and economic effects.

<u>Response</u>: Scoping meetings held by BPA largely determined public issues of concern. These issues were used to determine the significant resource concerns to be analyzed in depth in the EIS; the types and detail of data to be collected; and the criteria used in corridor identification, transmission route siting and the overall evaluation of alternatives. Of the 15 topical resource concerns used to analyze environmental consequences, six dealt with land uses (plans, urban-residential, forestry, agriculture, recreation and corridor development), three dealt with additional vital facets of the human environment (esthetics, social and economic considerations, and health and safety), and two dealt with the related human concerns of air quality and cultural resources. Only four resource topics dealt with the project's impacts on resources that aren't primarily related to the human environment.

The evaluation criteria (table 2.3), used to guide the route location process and then to summarize how well the routes had been located, are similarly divided. Of the 10 equally considered criteria, only one judges effects solely on natural systems. Two examine planning and location concerns related to development of existing and future transmission line corridors. Another evaluates the effects on multiple sensitive resources (whether natural or social) occurring together in sensitive areas. The remaining six criteria assess various effects on the human environment. Although health effects is not a separate criterion, the concern for health effects is included in the first two criteria which evaluate how well the alternatives avoid effects on people and the quality of life. Human population was clearly the prominent consideration of the EIS.

3. <u>Comment</u>: The word "environment" suggests such natural resources as timber, wildlife, scenic quality and soils. How is it possible that the Taft plan better reduces impacts on people, but not on natural resources, yet is still considered to be the environmentally preferred plan?

<u>Comment</u>: Actually, it seems the Taft plan has higher impacts on the environment--wildlife, forestry, vegetation, soils and water. How are you using the term "environment?"

<u>Response</u>: An important objective of an environmental statement is to discuss all significant effects of a project on the environment. The National Environmental Policy Act (NEPA) indicates that this discussion should consider not only the natural environment, but man-made or developed environments as well. The scope of the Garrison-Spokane EIS, therefore, was the environment as a whole, considering both "the natural and physical environment and the relationship of people with that environment" (40 CFR Part 1508.14). Because one environmental value must be balanced against another, identifying the environmentally preferable alternative involves difficult judgments. BPA has sought the views of the public and other agencies to assist in conducting the studies and determine the environmental preference. These analyses concluded that the Taft Plan would reduce impacts on people and most land uses but have higher effects on the natural resources (see response to comment #2). The overall determination of preference was based on four comparisons (see DEIS, p. II-3): Resource Data (table 4.3), Technical Considerations (table 2.1), Advantages/Disadvantages (tables 2.4 - 2.6), and Evaluation Criteria (table 2.3). Based on these comparisons, the Taft Plan was found to be environmentally preferred, considering overall effects. Its lesser effects on human environmental considerations (Socioeconomic, Land Use, Visual, and so on) counterbalanced its greater impacts on natural resources.

4. <u>Comment</u>: The route through Mineral County (Montana) has been identified as the environmentally preferred route and yet it has the highest impact on forestry, esthetics, recreation and water--the mainstays of life and economics in Mineral County. It isn't reasonable that this route could be identified as the environmentally preferred route.

<u>Response</u>: The Taft Plan was designated as environmentally preferred for reasons discussed in the response to comment #3. In a study area of this size, any route is liable to encounter sensitive areas. The Taft Plan is preferred because it crosses fewer such areas, because effects in these areas are generally not as severe as those in similar areas crossed by the other plans, and because impacts on these areas can more readily be mitigated.

5. <u>Comment</u>: Also, you cannot prove that the Taft Plan avoids environmentally sensitive areas (as stated on table 2.3). Forests and rivers are what is environmentally sensitive, not areas near freeways and highways.

<u>Response</u>: Environmentally sensitive areas were defined (Appendix A, Attachment 4) as areas where activities from transmission line construction, operation and maintenance could cause highly intense or otherwise significant impacts on one or more resources in the same general area. We agree that forests and rivers are environmentally sensitive. This criterion, however, focuses on identifying high impact or problem areas where significant intense problems would be probable, generally for a number of resources, and where mitigation efforts would not be enough to reduce the effects substantially.

As mentioned in response to comment #2, effects on people were considered of paramount importance, based on scoping and public involvement. Moreover, such impacts are often difficult, if not impossible, to mitigate, except by avoiding the resource to begin with; effects on natural systems except under extreme conditions can be significantly reduced using proper mitigation techniques. Therefore, most major environmentally sensitive areas have a significant social- or land use-related component.

6. <u>Comment</u>: Regarding table 2.3 Comparison of Alternatives--Environmental Ranking Summary: the Taft plan doesn't avoid residential and inhabited areas any more than the other two routes.

Garrison-Spokane EIS Wg0046:02-07-83

<u>Response</u>: The team used as measures the numbers of individual residences close to the routes (within one half mile), small developments or communities close to the routes (within one mile), and the amount of subdivided, but not yet developed, land actually crossed. The numbers below (also see tables 2.2, 2.4, 2.5, 2.6 of Volume I) are for portions of the preferred routes which are not in common:

|             | Communities/<br>Developments(#) | Individual<br>Residences(#)* | Undeveloped/<br>Subdivided<br>Land (miles) |
|-------------|---------------------------------|------------------------------|--|
| Hot Springs | 13                              | 323                          | 7.7  |
| Plains      | 5                               | 139                          | 3.1  |
| Taft        | 4                               | 97                           | 3.6  |

\* Includes all residences in communities within 1/2 mile.

These numbers, along with factors such as the amount and location of parallel construction, the degree of visibility, and the compatibility of the lines in the landscape, were used to evaluate impact potential and severity.

The analysis found the Taft Plan to best avoid--and avoid impact on--inhabited or developed areas.

7. <u>Comment</u>: The Taft plan will also cost more and have greater line loss. These factors do not support it as being the preferred alternative.

<u>Response</u>: Taft is the environmentally preferred alternative. Factors such as cost and electrical performance contribute to this determination to ensure that the route is feasible to build on. They are important factors--along with the environmental preference--in making the ultimate decision about which plan will be selected. Taft has also been designated as the overall preferred alternative and is the proposed plan.

8. <u>Comment</u>: On balance, the Taft Plan is not the environmentally preferred plan, but rather it is the politically preferred plan. It is routed to destroy the resources in areas that don't have enough clout to do anything about it.

<u>Response</u>: The fact that the Taft Plan does avoid the more populated areas is not due to any attempt by BPA to place a line where fewer people will be able to organize strong objections. Rather, it reinforces a commitment to locate a route that will have as little environmental effect as possible--particularly on people.

One of the criteria used in the socioeconomic ranking of the various routes was avoidance of concentrations of people. Unfortunately, in order to avoid one concentration of people, it was sometimes necessary to select a "least-impact" route that also passed by another, often smaller concentration of people. Hence, it may appear that "larger" counties were avoided at the expense of "smaller" counties.

The determination of preference reflects both a popular mandate about the importance of human resources and a professional analysis about the nature and severity of impacts and the potential for mitigation of those effects. Such analysis is performed by an interdisciplinary team of professional resource specialists. The preferences of the various political interests within the study area may coincide with this determination.

9. <u>Comment</u>: Finally, I would like to again bring up the idea of esthetics and viewer sensitivity. Although fewer people may be affected by Plan C, it seems that the effect would be far greater in amount. The change in appearance of the land to those who are sensitive to this is too much to bear.

<u>Response</u>: It is true that the potential for visual alteration is greater along the Taft Plan. However, the potential for reducing these effects through mitigation is also greater. This, combined with the fact that there would be significantly fewer viewers, led to the conclusion that the overall visual impact would be lowest for the Taft Plan. The sensitivity of viewers is high along all the routes and was not a differentiating or deciding factor.

10. <u>Comment</u>: The graphs in Appendix A (Attachment 4, p. 6) do not account for existing visual intrusion along parallel lines and in fact rate the Taft Plan as being the least visually objectionable. This is wrong. It would be better to keep all visual intrusion in one area and not make an additional area look bad.

<u>Response</u>: The transmission line would have a high visual impact regardless of whether it follows an existing corridor or goes through a new one. The extent of impact does vary and was determined by analyzing four main elements: visual quality, visual compatibility, viewer exposure, and viewer sensitivity. Of these, visual quality and visual compatibility took into account the existing transmission line on the northern route. Both these elements favored the northern route, partially as a result of this existing intrusion. Other factors such as the extent of visual exposure and the potential for mitigation in sensitive areas tended to favor the Taft Plan.

The graph referred to above was used to illustrate the differences between the three plans for each data item by showing the percentage of "high impact zone" crossed by each plan. The graph shows that the Taft Plan crosses a higher percentage of high visual quality and low compatibility landscape than the others, but that this is offset by a significantly lower visual exposure.

11. <u>Comment</u>: The EIS summary lists on page 3 the reasons why the Taft Route is environmentally preferred. Most of these reasons are only a matter of opinion. These six reasons are not proven to me:

1. Least social impact.

2. Best avoids developed and developing urban and residential areas (although it crosses through two developing subdivisions).

3. Avoids environmentally sensitive areas. This is addressed in the Appendix A, IV:ll. Miller Creek and Blue Mountain should be listed separately, and South Missoula should be added to the chart.

4. Would affect fewer recreationists on a year round basis.

5. Fewest river crossings, it minimizes the impacts on wildlife and avoids affecting the bald eagle.

6. Minimizes visual impacts.

If these reasons are going to be included, I would like to see some accurate counts of people using, viewing, and living on each route. I would also like to see proof that one area is more abundant in wildlife and eagles than another area. The other reasons listed are easier to prove 1) crosses least amount of agricultural land and 2) minimizes impact on archaeologic and historic resources.

<u>Response</u>: Each environmental criterion was applied to each route possibility, and each decision was supported by hard data and the best professional judgments of the analysts. Their conclusions are reported in the EIS. Further discussion of the points raised above is found in responses to comments in Parts III. I (social impact), III. A (urban/residential land use), II. G. 3 (environmentally sensitive areas), and III. J (visual concerns). See also the response to comment above. The remaining points are discussed below.

Point 3: Miller Creek and Blue Mountain were considered together, based on the first two factors listed on page 10, Appendix A, Attachment 4. Considered together, this area 1) would have a number of diverse resources susceptible to impact in the same area, and 2) would be large enough to be considered important at the study area scale. If the areas were to be treated separately, both factors might not be met, causing the areas to drop from consideration. South Missoula was not considered a separate problem area because impacts would be primarily on one resource (visual effects on developed land) and the effects would not be severe. (Also see the EIS section discussions in Chapter IV: ENVIRONMENTAL CONSEQUENCES.)

Point 4: there are no recreation use counts that can be applied to specific line segments, but portions of the study area are used more frequently and more year-round than other portions. Examples of these are Blue Mountain, Rattlesnake Creek, Ninemile Valley, and Rainbow Lake as opposed to Black Mountain, Ninemile Divide, Siegel Mountain and Camel's Hump. Judgments on impacts to recreationists were based on the proximity of line segments to these known higher use areas. For points based on consultation with U.S. Forest Service and Montana Department of Fish, Wildlife, and Parks personnel and on review of data maps provided by these agencies, we have determined that bald eagle abundance does vary throughout the project area. In comparing the amount of habitat crossed by each of the plans, we have found that the Taft Plan crosses less habitat and fewer river crossings and therefore would avoid effects on bald eagles which would be sustained by the other two plans. (See fig. 4.6 and tables 4.3 and 2.2 in Volume I for statistics on this subject.) For bald eagle distribution and census counts, refer to the following publications:

Lingel-Pate, T., 1981. Status of Wintering Bald Eagles on the Lolo National Forest. Lolo National Forest, Missoula, MT. 39 p.;

Raptor Information Center. 1979. Bald Eagle Distribution During The NWF's First Annual Midwinter Bald Eagle Survey 13-27 January, 1979. National Wildlife Federation, Washington, D.C.;

Pramstatter, M.E., 1981. Final Results of the Second Annual Midwinter Bald Eagle Survey. Raptor Information Center, National Wildlife Federation, Washington, D.C.

12. <u>Comment</u>: The other plans (Hot Springs, Plains) cross extensive areas of open range and run parallel to river valleys and thus would cause less environmental impact.

<u>Response</u>: It is true that the Hot Springs Plan crosses significantly more open range and river valley land than the Taft Plan, and that effects on most natural resources would be proportionately lower for this reason. It is not accurate to characterize the Hot Springs plan as being located primarily on range and/or in a river valley. More than half of the plan crosses forested mountains or foothills, particularly in the Garnet and Coeur d'Alene mountains, where impacts similar to those for the Taft plan would occur.

It needs to be emphasized that while in places the Hot Springs Plan avoids affecting many natural resources by crossing open range and routing down the Clark Fork, in other places it creates another set of problems by crossing nearer to people, by increasing potential for land use conflict and by encountering sensitive land uses such as agriculture.

13. <u>Comment</u>: On these plans, particularly Hot Springs, impacts caused by the existing transmission lines were ignored, making the comparison unfair.

<u>Response</u>: For about half of its length, the Hot Springs plan would be built parallel to an existing line. (See also table 2.1 in Volume I.) For a short distance, rebuilding would take place on an existing right-of-way. For some resources, impacts would occur irrespective of the existing line. For others, there would be an incremental increase in impact above an existing level. Each resource analyst considered the existing line in his impact analysis. The overall plan comparison does fairly reflect the effects of the existing line.

14. <u>Comment</u>: Forest management should be added to the list of land use related constraints which detract from the decision to further develop the corridor right-of-way.

<u>Response</u>: Forest management is reflected in the Evaluation Criteria as Criterion IC - Avoids Intensively Managed Forest Land (see DEIS p. I-13/14; table 2.3; and Appendix A, Attachment 4, p. 3). 15. <u>Comment</u>: The Forest Service . . . right-of-way, if granted, must be satisfactory to Montana citizens or it must not be granted at all. . . . The right-of-way must avoid residences and must not adversely impact visually or aesthetically on Forest Service land or on privately owned land. . . The [Forest Service] right-of-way must not impact on crop producing land unless specifically agreed to by the owner . . . The [Forest Service] grants for the right-of-way must require burial of the transmission line in areas where adverse aesthetic and visual impacts must be mitigated by this means . . . All underground burial of the transmission lines, must be examined to reach a satisfactory environmental impact statement.

<u>Response</u>: The goals stated in your comment have been echoed by many people in the project area. The essence of most of these goals are captured in the environmental evaluation criteria (Chapter II of Volume I) or considered elsewhere in the document. While these goals are desirable standards to be attained to the maximum extent practicable, there will be times when all goals cannot be achieved and a balance or trade-off among environmental factors or environmental economic and technical factors must be struck. The proposed action, as stated in Chapter II, best meets the goals offered.

# II. H. BIOLOGICAL AND ELECTRICAL EFFECTS

People expressed strong concerns about potential adverse health effects associated with high-voltage transmission lines and about a perceived lack of research data on the potential long-term health effects. They felt that if BPA could not be 100 percent sure of the line's health impacts, then the line must not be built near people.

Many commentors felt that health and safety was an important issue and that not enough attention was paid to it. Health and safety research data presented in the DEIS was questioned and labeled by some as insufficient and misleading. Concern was expressed over the lack of research data performed by independent agencies. Alleged conflicts between published reports of research results, particularly on research performed at Batelle Northwest Laboratories, and conclusions presented in the DEIS were pointed out. Potential adverse effects on bees, livestock, and wildlife were also considered important issues.

The safety of working and playing in the line's vicinity was questioned. Of particular concern were the effects of shocks received from objects affected by induced currents, the safety of irrigation operations near lines, and safety of children playing near the line or the towers. Other issues addressed in the comments included concern for airplane safety, hazards presented by breakage of a conductor, the cause of conifer tip burn, corrosion of metal pipes and roofs, and the lightning hazard presented by transmission towers.

Commentors felt that more research on the health effects of transmission lines is needed and should be adequately funded. However, residents near proposed routes objected to being made guinea pigs for future health effects studies. An additional concern related to biological and electrical effects was the effect of transmission line noise on humans and wildlife. Also, the effects of transmission lines on radio and television operations and the willingness of BPA to mitigate any adverse effects was questioned.

A comprehensive discussion of biological and electrical effects is presented in Volume I (Chapter IV: ENVIRONMENTAL CONSEQUENCES). Additional responses are provided below.

1. <u>Comment</u>: Health and Safety is an extremely important issue that BPA doesn't want to acknowledge.

<u>Response</u>: As a result of the EIS scoping process, health and safety (effects of electric and magnetic fields and of corona) was identified as a primary concern. This subject is the first area of controversy listed on page x of the EIS SUMMARY. In response, the DEIS devoted ll pages to summarizing the state-of-the-art of field and corona effects research, citing nearly 60 references. In addition, two BPA reports were incorporated by reference that provided more detailed information on these subjects.

Because of the high interest in biological and electrical effects, special effort was also devoted to providing the latest information at the public meetings on the draft EIS. A panel display was prepared to clarify the basic electrical and biological effects of transmission lines. A 15-page booklet was prepared for use as a handout at the meetings. In addition, BPA experts recognized as among the most knowledgable persons in the United States on biological effects attended the meetings.

During preparation of the DEIS, work was also underway on updating BPA's generic report on electrical and biological effects of transmission lines (Electrical and Biological Effects of Transmission Lines: A Review). This report, incorporated by reference in the final EIS, represents one of the most comprehensive and up-to-date coverages of the biological and electrical effects of a.c. and d.c. transmission lines.

Results of this extensive ongoing information review and the analysis of comments received on the draft EIS provide no evidence that the fields from 500-kV lines in themselves pose a health hazard. The same conclusions can be reached from the results of numerous other reviews of this subject by agencies in the United States and in several other countries.

The DEIS does point out several known or possible effects associated with the electrical properties of 500-kV transmission lines. These include radio and television interference, audible noise, nuisance shocks, potential electrocution hazards, effects on trees and honeybees, and potential effects on cardiac pacemakers. The first two evaluation criteria described in table 2.3 of the EIS SUMMARY involve minimizing disruption of land uses in inhabited areas, and minimizing disruption of people's lives and life styles. Therefore, effects on people and the quality of life did receive relatively heavy weighting.

2. <u>Comment</u>: If BPA can't prove the transmission line is 100 percent safe then it should not be built anywhere near people.

<u>Response</u>: Several comments expressed opinions that not enough is known about electric field effects on people and animals. These comments emphasized possible, potential, unforeseen, undetermined, or unknown effects and often indicated that the line should be proved 100 percent safe.

The DEIS pointed out that it is not possible to conclude that there is zero risk associated with electric field exposure and that, therefore, some uncertainty exists (Summary p. x; DEIS p. IV-23). It should be evident that, scientifically, nothing is ever known with absolute certainty. The DEIS acknowledged, therefore, that risk (uncertainty) is not unique to transmission lines. There are "risks" associated with the air we breathe, the many chemicals we use, the food we eat, and most other things we encounter in our daily lives.

Electric fields have been extensively researched. The unspecific statement in one comment that "many authorities" say transmission lines are a health hazard is not accurate. As pointed out in the DEIS, numerous reviews by authorities throughout the world basically conclude that transmission line fields have not been shown to represent a health risk of any consequence. The assertion that residents living near 500-kV transmission lines are in effect "guinea pigs" is without basis. BPA personnel who have worked around high voltage facilities for many years, and those who conduct research on electric fields, express no concerns about living near transmission lines as far as possible health risks are concerned.

3. <u>Comment</u>: The research by Battelle-Northwest Laboratories showing definite biological effects should be addressed in the EIS.

Response: Research by Battelle-Northwest Laboratories (BNL) was summarized in the DEIS (table 4.11) and was described in the special booklet prepared as a handout at the public meetings on the DEIS. This research is also discussed in the BPA publication <u>Electrical and Biological Effects of</u> <u>Transmission Lines: A Review</u>. The Battelle studies are sponsored by DOE and the Electric Power Research Institute.

Some commentors referenced a talk by BNL researcher Dr. Larry Anderson, given in Missoula on May 13, 1982, and articles on the talk appearing in the <u>Missoulian</u>. The DEIS indicated that the BNL research found no effects in several important studies, and detected subtle effects of small magnitude in others. Unfortunately, the coverage of Dr. Anderson's talk in the <u>Missoulian</u> was neither objective nor accurate, according to Dr. Anderson. That letter is reprinted, in its entirety, below. June 7, 1982

Mr. Jerry Frick Engineering Manager Bonneville Power Administration P.O. Box 3621 Portland, Oregon 97208

Dear Mr. Frick:

Dr. Richard Phillips has requested that I respond to your letter of May 18, 1982 regarding an article in the <u>Missoulian</u> on a lecture in Missoula on May 14. The seminar, given at the University of Montana, was a Sigma Xi lecture, set up early in March. It was to be a scientific presentation of current results from the bioelectromagnetic studies being conducted at Battelle Pacific Northwest Laboratories.

When I arrived at the seminar it became quite evident that interest in the topic was much broader than just scientific, with TV, radio and newspaper reporters present to cover the talk. The reporters from both Missoula TV stations and a reporter from one radio station requested interviews following the seminar. The following is my assessment of the accuracy and objectivity of the media coverage.

# Television

Both TV stations in Missoula (KECI and KPAX) covered the lecture and interview (with Dr. Anderson). Their reports, aired on the 6:00 p.m. and ll:00 p.m. news casts, were objective and presented an accurate reflection of the Battelle studies. Briefly, they covered the information that some biological effects do occur in animals exposed to high strength electric fields but that "biological effect" does not mean "hazard" or "benefit". Rather, that a few biological perturbations can occur by exposure to the field. They also aired the observation, based on experiments to date, that electric field effects are relatively subtle and that questions concerning dose-response or duration of effects have not yet been answered.

#### Radio

I have not heard the broadcast so I can't readily comment on this -except that I tried to stress again the meaning of "biological effect", i.e., an effect is not automatically either a risk or a benefit to the animal.

# Newspaper

Unfortunately, the article printed in the Friday, May 14 issue of the <u>Missoulian</u> was neither objective nor accurate in its report. In part, this appears to be due to misunderstanding or lack of technical understanding on the part of the reporter; e.g., "the pineal gland is the

center of an animal's biological clock", which it is not, in all the animals discussed in these studies, nor is it in man, which was inferred. More objectionable, however, was the heavy implication by the reporter that I (Dr. Anderson) and Battelle have strong and serious concerns about health risks due to powerline electric fields. This suggestion was conveyed by the headline, the opening paragraphs and especially the selection of "loaded" words; e.g., repeated use of "abnormalities" instead of biological effects; people as better conductors of <u>electricity</u> than surrounding air; "a <u>definite link</u> [between] powerline electrical fields and <u>abnormalities</u> in the nervous system" (simply not true). Tucked back on the second page was a brief reference to a few areas where no effects have been observed, although on balance these areas far outnumber areas where effects have been observed.

The reporter completely ignored the several statements suggesting that the effects that have been observed are quite subtle and that all the answers are not yet in. No space is given to the repeated emphasis that biological effects do not mean biological hazards but statistical excursion outside the normal range (must be where "abnormalities" came from) of the animals' response to stimuli.

At Battelle we have conducted a broad range of investigations into possible biological effects of exposure to high strength electric fields. Only recently have the studies advanced to the point where we can begin to address questions concerning biological consequences. As yet very little work has been done to look at the rate of recovery from observed effects; i.e., whether the few observed effects are transitory or of long duration. Almost all experimental work to date has been at high strength, chronic (30+ days, 20 hr/day) exposures. Also the question of mechanisms-critical information needed before one can extrapolate effects seen in laboratory animals to potential effects in humans - is unanswered at the present time.

If you have additional questions or if I can be of further assistance please contact me.

Sincerely,

/s/ L.E. Anderson, Ph.D. Associate Manager Bioelectromagnetics Section BIOLOGY DEPARIMENT

As was indicated on page IV-24 of the DEIS, one reason for some unfounded fears about biological effects of transmission lines appears to be due to some popular articles. These articles often contain technical inaccuracies, and place undue emphasis on the relatively few effects that have been reported.

4. <u>Comment</u>: There hasn't been enough research so no one knows if there might be long-term effects of the transmission line after 20 or 30 years.

<u>Response</u>: BPA has been operating 500-kV lines since 1967 and there have been no verified health effects from residents living near the line. As discussed in the DEIS, numerous studies done with both laboratory animals and people indicate that long-term, harmful effects on people from transmission line fields are unlikely. This research includes studies of multiple generations of animals, and studies of people who have worked around high voltage transmission lines for 20 years. The DEIS did discuss some studies that have found actual or potential harmful effects in people and animals. However, these effects have not been consistently found in other studies. There is a general consensus among scientists who have reviewed this research that no hazard has been identified.

It is of course not possible to predict with certainty whether effects might develop after 30 years exposure to transmission line fields. It should be pointed out that even people living adjacent to transmission lines or working on rights-of-way receive only intermittent exposure to electric fields. Furthermore, buildings and trees shield the field in most cases.

5. <u>Comment</u>: There wasn't enough information in the EIS on effects of electric and magnetic fields and corona, and what was included was not done by experts, was misleading, and inconclusive.

<u>Response</u>: The DEIS devoted 11 pages to the effects of electric and magnetic fields and corona; it also cited nearly 60 references. Two other BPA reports (totaling over 80 pages) on these subjects were incorporated by reference. Thus the material represented a comprehensive presentation for persons who wanted more detailed information. The material in the FEIS and the BPA publication <u>Electrical and Biological Effects of Transmission Lines: A</u> <u>Review</u> were further updated. Together they represent the most comprehensive and up-to-date material available on field and corona effects of a.c. and d.c. transmission lines.

The BPA personnel responsible for the field effects and corona effects material are generally acknowledged, by informed persons, to be among the most qualified persons in the United States on these subjects. They have personally conferred with most of the groups in the United States and other countries who are actively involved in field and corona research. In addition, these people have written numerous technical papers and served on some of the most important national committees related to these subjects.

None of the comments cited any specific new information or studies, or referenced any conclusions by qualified researchers or agencies, that differ with the conclusions presented in the EIS.

6. <u>Comment</u>: We have been misled because not enough research, especially by independent groups, has been done on health effects, which demonstrates a lack of concern for people.

<u>Response</u>: As indicated in the DEIS, research on the biological effects of electric fields has been underway for around 20 years. Hundreds of studies have been done throughout the world involving plants, animals, and people.

Most of this research has been sponsored by utilities (including BPA) which indicates the concern the industry has for obtaining information on the effects of their facilities. The actual research has generally been done by independent, private contractors. Results of the research are openly and objectively presented in project reports and in published papers.

When the research has identified adverse effects, BPA and many other utilities have taken the lead in disseminating information on the effects and have taken steps to mitigate them. Examples include induced shocks, annoyance from audible noise, radio and television reception interference, effects on honeybees, induced corona on trees, fuel ignition, and possible effects on cardiac pacemakers.

Unfortunately, many persons have apparently been misled about the effects of transmission lines by some news accounts and other popular publications that are technically inaccurate and non-objective (see response to comment #3 on research by Battelle-Northwest Laboratories).

7. <u>Comment</u>: How much radiation will the line produce (including out to 1000 feet and to 1/4 mile) and what about the combined effect of multiple lines?

<u>Response</u>: As described in the DEIS, the wavelength at the power frequency of 60-Hz is 3100 miles compared to a wavelength of around 1 foot for microwaves. Because of the low frequency and long wavelength, transmission lines do not "radiate" 60-Hz energy comparable to radio and television transmitting antennas. Transmission line conductors, like all energized wires, do produce electric fields in the area surrounding the line. The strength of these fields, however, decreases rapidly away from the line. Field strengths for the proposed line were given in the DEIS and in the BPA reports incorporated by reference.

At 250 feet from the center of the 500-kV double-circuit line, maximum electric field strength outdoors would be of about the same magnitude as the field near many household appliances, i.e., 74 V/m. At 1,000 feet, the field would most likely be less than you are experiencing from lighting fixtures as you read this in your home or office (i.e., 2 V/m). If there are trees or buildings between the line and these points of measurement (i.e., 250 feet, 1,000 feet) the electric field would be even further reduced and possibly not be measurable.

Even the maximum magnetic field directly under the 500-kV double-circuit line (i.e., 0.33 gauss) is much smaller than fields found near many appliances. At 250 feet from the center of the 500-kV line, magnetic field strength would be only 0.00065 gauss. This is comparable to the average magnetic field strength found throughout a typical home not located near a transmission line.

8. <u>Comment</u>: Several studies have shown definite adverse biological effects of electromagnetic radiation, some of which extend 1,000 feet from a transmission line.

<u>Response</u>: These comments were apparently prompted by a talk given in Missoula by journalist Paul Brodeur, author of <u>The Zapping of America</u>. This book dealt with microwaves and their actual and potential biological effects. We are not aware of any engineering or scientific expertise Mr. Brodeur has related to 500-kV transmission lines. A statement attributed to the author is that harmful effects occur 1,000 feet from a transmission line. As noted in the previous response, at 1,000 feet the maximum electric and magnetic fields from a 500-kV transmission line are essentially the same strength as those produced by household wiring and appliances.

Mr. Brodeur apparently relied heavily on the work and opinions of Dr. A. Marino in addressing studies related to transmission lines. Dr. Marino's work is summarized in the EIS and the BPA Electrical Effects booklet. In brief, his views oppose the majority of scientific opinion, which holds that transmission lines are not a health hazard.

9. Comment: Exposure to radiation from nuclear bomb tests, and to asbestos were once considered safe. Do you see any similarities to the statements now being made about transmission lines?

<u>Response</u>: Nuclear bombs produce what is called ionizing radiation. It was known before the testing that this kind of radiation can cause harmful biological effects because of its high energy. Ionizing radiation (e.g., X-rays, gamma rays) is known to penetrate tissue and alter molecular structure. There are, however, differing scientific opinions as to whether harmful effects occur with relatively small radiation doses. The threshold (or existence of a threshold) for known effects of ionizing radiation is a point of controversy.

With 60-Hz magnetic and electric fields, many years of research have not produced evidence for a consistent harmful biological effect (other than shocks). This applies to field levels much stronger than those produced by transmission lines. Further, no mechanism has been identified that could likely cause harmful biological effects. This of course does not mean that some effects are not possible, but that compared to ionizing radiation such effects must be extremely subtle.

In the 1920's the disease "asbestosis" was attributed to the inhalation of asbestos particles which interfere with oxygenation of the blood. By the 1960's, evidence was growing that persons who worked with asbestos in shipyards and factories also experienced higher death rates from lung cancer. As with ionizing radiation, definite effects in people and a plausible mechanism for the effects were found. Most of the evidence on asbestos came from studies of people rather than laboratory animals, so it took longer for a problem to be identified. In retrospect, however, the early evidence should have been cause for concern.

Unlike the asbestos case, many laboratory studies have been done to determine if transmission lines are a health hazard. Also, several occupational studies have been done of linemen and substation workers which found no evidence for harmful effects of electric or magnetic fields. The discussion in Chapter IV,

Volume I, describes these studies and those few in which effects have been found or suggested.

It is not possible to know the future. However, the best scientific evidence available to date provides no indication that health hazards such as those associated with ionizing radiation and asbestos, will eventually be attributed to transmission line fields.

10. <u>Comment</u>: There is not enough information on the long-term effects of corona discharge, especially the amount of ozone produced.

<u>Response</u>: As indicated in the DEIS, the amount of ozone produced by transmission lines is insignificant. This is based on results of several studies and reviews, which are referenced in the BPA Electrical Effects Review. As an example, BPA monitored ozone near the 1100-kV prototype for 2 years. There was no measurable increase in average background ozone concentration due to the line.

11. <u>Comment:</u> What are the effects of transmission lines on horses, cattle, and other livestock including breeding and fertility problems?

Response: The DEIS described two studies of farm animals living near 765-kV lines in which no health or breeding problems were found. The BPA Electrical Effects Review references five other studies which also show that transmission lines cause no noticeable harmful effects on livestock.

The DEIS referenced a situation in Minnesota where some people perceived that their livestock had been harmed by a d.c. transmission line. However, no reports of livestock problems have occurred in 12 years of operation of the d.c. Pacific Intertie. A recent study in Minnesota also found no evidence that the d.c. line affected dairy cattle.

12. <u>Comment</u>: The BPA says it will conduct a 3-year study of the effects of 500-kV power lines on winter elk range in the Deerlodge National Forest. Mr. Lee says it is extremely unlikely that any adverse effects would be severe enough to warrant moving the towers, but the information will help evaluate future projects. It seems ludicrous to me that you consider building towers prior to this research.

<u>Response</u>: It is not possible to to determine the effects of a transmission line right-of-way on elk unless there are elk and a transmission line to study. Based on a study of elk near a 500-kV line in Idaho, no effects are expected that would be serious enough to require tearing down a 500-kV line. However, the BPA/Forest Service study to be done in the Boulder River area will involve a somewhat different setting, i.e. a high altitude winter area. It is possible effects may differ from the situation in Idaho. Any effects that may occur would likely be related to changes in vegetation, hunter access, or possibly audible noise. 13. Comment: Will children climb the transmission towers and be injured?

<u>Response</u>: Neither children nor adults should attempt to climb transmission line towers or fly kites or model airplanes near the lines. These are common sense precautions such as we must apply in many situations in our everyday lives. Parents should use the same responsible judgment in instructing children about safe behavior around powerlines, as they do for other potentially hazardous situation (e.g., crossing highways, building fires, using household chemicals, and so on). In practical terms, the risk associated with transmission lines is slight. We are not aware of any case where a child has been injured because of a BPA 500-kV line. There are 3,500 miles of those lines in the Northwest.

14. <u>Comment</u>: The EIS implies shocks are not harmful, and it appears that some children could be injured from shocks due to induced voltages.

<u>Response</u>: There was no intention to imply that shocks are not potentially harmful. They are. That is why BPA 500-kV lines are designed to meet or exceed the National Electric Safety Code limits. The 5 mA limit for induced currents in the code is based on estimated "let go" levels for children. BPA policy is to design 500-kV lines so induced currents are generally far less than the limit allowed by the NESC. BPA has operated 500-kV lines since 1967 and no child has been injured by induced currents from these lines. To date, there has been no need identified to justify the additional costs of designing 500-kV lines that produce no nuisance shocks at all.

15. <u>Comment</u>: Transmission lines adversely affect agricultural operations because they are hazardous to people and machinery and this line has been rerouted [i.e., in Granite and Powell Counties] because of these problems.

<u>Response</u>: Public concern for effects on agricultural land--along with concern for many other resource topics--has led BPA to develop alternative routes which offer the options of reducing or avoiding a particular sensitive area. However, BPA has never found it necessary to reroute lines because of such "severe health and safety problems." BPA lines cross all types of agricultural areas and few complaints about electrical-related problems are received.

As indicated in the EIS and the references BPA reports incorporated by reference, any powerline is potentially hazardous if irrigation equipment or farm machinery is improperly used near the lines. By following simple safety precautions, however, most agricultural activities can (and do) occur on 500-kV rights-of-way. Accidents have occurred when irrigation pipes are extended too close to distribution lines, which have lower voltages. However, 500-kV conductors are higher off the ground. We are not aware of any instance where a BPA 500-kV line has resulted in an electrocution accident to an agricultural worker.

The DEIS also pointed out that nuisance shocks (due to induced voltages) can occur near a 500-kV line. To prevent potentially hazardous shocks, BPA routinely grounds all fences and other metallic objects of a certain size and

within specified distances from the line. By following simple practices, farm workers can also eliminate or minimize nuisance shocks that occur if a person in rubber boots (e.g., insulated from ground) touches a grounded object in the maximum field area.

16. <u>Comment</u>: Will a 500-kV line affect a cardiac pacemaker, i.e., will it stop operating or can a person be electrocuted?

<u>Response</u>: Pacemakers were discussed in the DEIS and are further addressed in the two BPA reports incorporated by reference. Basically, there are no known cases of a BPA 500-kV line harming the wearer of a cardiac pacemaker. However, research sponsored by utilities has shown that under some conditions certain kinds of pacemakers could be affected by the maximum fields produced by a 500-kV line. The most likely effect in such a case would be for the synchronous pacemaker to revert to pacing in the asynchronous mode, i.e. begin pulsing the heart at a regular rate. This is basically a safety feature of the pacemaker and is not necessarily harmful. Because a reasonable potential for an effect exists, persons who may be concerned about their own particular situation may want to consult with their doctor. A further disussion is available in the BPA publication, <u>Electrical and Biological Effects of</u> Transmission Lines: A Review.

17. <u>Comment</u>: Is there a chance that part or all of the line might be d.c. and didn't a d.c. line cause health problems in Minnesota?

<u>Response</u>: As indicated in the DEIS, the line section between Garrison to either Hot Springs, Plains, or Taft may be designed so that one of the two circuits could be converted to direct current (d.c.) should such a need be identified in the future. However, if BPA should consider converting to d.c., appropriate environmental assessment procedures would be followed at that time.

The DEIS described the situation in Minnesota that developed over the construction of a <u>+400-kV</u> d.c. line. The BPA Electrical Effects Review also describes d.c. lines and their electrical and biological effects. In summary, there is no evidence that the electrical properties of d.c. lines have caused any harmful effects to people or animals.

18. <u>Comment</u>: Someone told me transmission lines affect bees, so will I lose money if I put hives by a 500-kV line?

<u>Response</u>: Studies sponsored by BPA and the Electric Power Research Institute have shown that honeybees can be adversely affected by shocks inside hives that are placed on high voltage transmission line rights-of-way. The electric field outside the hive is not harmful to bees. In a practical sense, apparently few beekeepers intentionally place their hives near a 500-kV line. BPA has received no complaints from beekeepers about these existing lines. If for some reason, a person would want to place bee hives on a 500-kV right-of-way, effects are eliminated by simply connecting the standard metal hive top to a ground rod. 19. <u>Comment</u>: Also, the BPA is willing to bend over backwards to paint the towers green so they are a pretty color to minimize eyesore, but nowhere do they mention being willing to bend over backwards to minimize ill health effects.

<u>Response</u>: The DEIS did point out that BPA uses several design and mitigation measures to minimize or eliminate adverse electrical effects. For example, large bundled conductors are used that greatly reduce audible noise and ozone production. Also, BPA lines are designed so that induced currents from objects are far less than the level allowed by the National Electric Safety Code. BPA also goes to great effort to provide factual information to the public about safe working practices around transmission lines. The above measures have been very effective, as no citizen has been injured by the electrical properties of a BPA 500-kV line in the 16 years this voltage has been in operation.

20. <u>Comment</u>: Conifer tip burn is noted as a possible effect of exposure to electric fields but no mechanism is ever delineated. What causes the damage?

Response: Research sponsored by BPA has shown that some trees left growing very near the 1100-kV prototype were damaged on the tips of upper branches. The tip damage (i.e., burning) is caused by localized currents due to corona from high intensity electric fields existing near the treetops. Corona is a partial breakdown of air at the tips of sharp-pointed objects. Overall growth of the trees has apparently not been affected.

21. <u>Comment</u>: The constant noise from the 500-kV line would be devastating to people and animals.

<u>Comment</u>: I've done a little bit of hunting in my time and I notice that nine out of ten times what makes the animals run is when you step on a twig and make a little noise. What would you think would happen with a 500-kilovolt line buzzing overhead?

Response: As described in the DEIS and in the BPA Electrical Effects Review, audible noise from BPA 500-kV lines is neither constant nor devastating. The audible noise is primarily a foul-weather phenomenon. Water droplets on the conductors form corona discharge points which produces a crackling, hissing noise. During snow, a 120-Hz "hum" may be present. With the newest 500-kV line design, BPA receives few noise complaints from persons living near those lines. As pointed out in the DEIS, some persons find the noise annoying because of its high frequency components. However, the intensity of the noise rapidly diminishes away from the line.

Research has demonstrated that animals show little if any reaction to the noise produced by transmission lines. A study in Idaho found that the noise from a 500-kV line did not deter deer and elk from using the right-of-way. However, the presence of hunters on the right-of-way did cause big game to avoid the right-of-way and other clearings. Hunted animals quickly learn to associate the sight and sounds of people with danger. A 5-year-long study of the BPA 1100-kV prototype line further indicates that noise from corona discharge does not adversely affect wildlife.

This information has been added to the EIS. More detailed discussion is available in <u>Electrical and Biological Effects of Transmission Lines: A</u> Review, available from BPA.

22. <u>Comment</u>: My personal opinion is I doubt BPA goes around grounding everyone's fences and all the fences.

Response: BPA does ground all fences and other objects of certain sizes and distances from 500-kV lines when the line is constructed.

23. <u>Comment</u>: If a power line tower is hit by lightning, we could be electrocuted.

Response: Lightning will usually strike the highest object in an area. In rural areas, this may be a powerline tower or conductor. Transmission facilities are designed to withstand lightning strikes by channeling them to ground through the tower. However, to play it safe, you should stay away from towers, trees, and other tall objects during electrical storms.

24. <u>Comment</u>: I was with you last week at a hearing in St. Regis, Montana. The purpose of the discussion was the proposed 500-kV line which your maps show as crossing directly over my home 2.5 miles east of St. Regis on Highway Rt. 135. My property is riverfront property below the highway and railroad. I am opposed to this particular line. . .

In dry years, we have a problem with grounding the power line that feeds our property at the present time. We get electrical shocks from water faucets and switch boxes even though they are properly grounded. My electrician says your line running through this area will complicate this problem and will certainly make it worse.

<u>Response</u>: Electrical shocks from water faucets, pipes, switch boxes, etc. are generally related to poor grounding of the house electrical system. The addition of a high voltage power line will not contribute to this problem. However, the problem can and should be alleviated by having a proper grounding system installed in accordance with the National Electric Safety Code, by a qualified electrician.

25. <u>Comment</u>: Talking about barbed wired fences and automobiles, how far away from the power lines do you have to be before nothing happens?

Response: To prevent annoyance shocks near a 500-kV line, metal objects such as fences near the line are routinely grounded by BPA maintenance personnel. In general, any fence more than 250 feet from the outside conductor need not be grounded. Although vehicles less than 14 feet high can be driven beneath lines, vehicles should be 70 feet from the line when they are refueled.

26. <u>Comment</u>: What are electrical effects including shocks that occur near 500-kV lines?

<u>Response</u>: BPA designs and maintains its facilities to meet or exceed the rules set forth in the National Electric Safety Code to insure the safety and health of the public. However, every kind of electrical installation must be treated with respect. Avoid bringing yourself or any object you are holding anywhere near an overhead line. More information on pacemakers, vehicles, irrigation pipes, fences, and so on is contained in BPA publication <u>Living and</u> Working Around High-Voltage Power Lines.

27. <u>Comment</u>: A number of concerns were raised about possible effects (corrosion or other interference) of a 500-kV line on metal roofs and fences and on metal and/or plastic irrigation systems.

<u>Response</u>: The Bonneville Power Administration has operated high-voltage power lines since 1937 in agricultural areas where metal or plastic irrigation systems, metal-roofed storage sheds, and wire fences are common. During this period, many studies have been conducted to determine the influence of a.c. lines and their associated electrical fields on the corrosion of metallic systems, including aluminum irrigation pipe. All studies to date indicate that these a.c. fields do not measurably contribute to the normal corrosion processes.

For safety in ongoing use of these underground pipes or irrigation systems located on the right-of-way, care must be taken for proper installation and maintenance; they should be installed at an angle of 60 degrees or more to the transmission line centerline. A perpendicular crossing is best. Underground pipes should not be installed closer than 53 feet to a BPA structure or the buried grounding system. Any necessary changes to an existing system would be compensated by BPA.

In the case of metal roofs and fences near the power lines, BPA has a standard policy for grounding them to prevent nuisance shocks.

28. <u>Comment</u>: If you are farming under a line and you haven't got your vehicle grounded, will you get shocked when you get off?

<u>Response</u>: A vehicle under an extra-high-voltage line will not normally carry an induced voltage because the electric charge drains away through the tires since most tires are semiconducting. An even better path to ground can be achieved by attaching a chain to the vehicle that reaches the ground. But even then, one can still get a nuisance shock if the vehicle is parked very near the line and on a nonconductive surface, such as dry rock.

29. <u>Comment</u>: They also said that someone did a test near lines like this. It lit light bulbs in someone's hand. We now live about two blocks from a substation. We experienced underground electric shocks from this. We called Montana Power in and they came to our assistance. They checked it out and said our home was grounded and we still were continually shocked at different times in the home and he said that it was an underground current that was coming from those substations. This is a problem, I believe.

<u>Response</u>: Light bulbs (incandescent) will not light when held in the electric field near a transmission line. Fluorescent tubes will glow in the fields near 500-kV lines and in fields near such things as automobile ignitions and C.B. radio antennas. Our experience on similar problems has generally found that shocks are due to poor grounding of the house's electrical wiring system. The utility (in this case Montana Power) can and should determine the cause of these shocks and recommend a procedure to eliminate them. If such a situation occurs due to the operation of a BPA substation or power line, it will be investigated and mitigated by BPA.

30. <u>Comment</u>: I object to the Hot Springs line on reasons that we have had problems. You've got a safety hazard as far as flying planes under these.

<u>Response</u>: Federal Aviation Administration Regulations prohibit planes from flying under transmission lines. However, BPA exceeds FAA requirements in the marking and lighting of our transmission lines in areas where a hazard to aircraft has been determined to exist.

31. <u>Comment</u>: I think you'll have to explain what would happen if one of these lines would break in [a populated area] and drops onto the highway. What happens if the top transmission line drops down onto the bottom one? Then what happens to the ground and surrounding people? These things I think have to be answered very well and very clearly to the health and safety.

<u>Response</u>: If the top conductor drops into the bottom conductor, or a conductor drops on the ground, protective relays will deenergize the line in a fraction of a second. On lower voltage distribution lines, however, conductors on the ground may still be energized and should be completely avoided.

32. Comment: What about interference with radio and television reception?

<u>Response</u>: Television reception in the proximity of a 500-kV line may suffer interference during rainy weather in areas with a low station strength such as those classed as Grade B (signal strength of 224-2509 microvolts per meter) or below by the Federal Communications Commission. These areas are usually far from the transmitter. In general, television interference can be mitigated by relocating the antenna or by extending an existing television cable system.

Weak AM radio signals next to transmission lines may also be interfered with during rainy weather. In remote areas where signal strengths are very low, interference may occur up to 500 feet from the line. In cities or areas where transmitters are nearby, few problems occur. FM radio reception is rarely affected. However, should it occur, the same measures that reduce television interference will work for FM radio.

If residents experience television or radio (including CB) reception problems due to the line, BPA will investigate such reports and provide appropriate mitigation to restore reception if a BPA facility is found to be the cause. 33. <u>Comment</u>: What effect does this transmission line have on people when they walk under it in a dry condition as opposed to a wet condition?

<u>Response</u>: BPA transmission lines are designed so there are no harmful effects on a person walking under the line during either dry or wet weather.

34. Comment: Is there a definite amount of money set aside for research [biological effects] either in connection with Battelle or some other laboratories that are working? . . . Wouldn't you pursue this on your own? [If DOE funding were cut.]

Response: The U.S. Department of Energy and the Electric Power Research Institute have been spending over \$5 million annually on biological research involving electric fields. BPA has spent nearly \$1 million on a contract with Battelle-Northwest for biological research. It is likely that BPA would continue sponsoring research even if some DOE programs were reduced.

35. <u>Comment</u>: What is BPA's responsibility/liability if it is later shown that the line has caused adverse health effects?

Response: 'The United States can be sued only with the express consent of Congress. Congress has expressly consented to be sued for property damage and personal injury as provided for under the Federal Tort Claims Act. Under the Federal Tort Claims Act, the Government's liability for negligence is much like that of any private citizen. (This type of liability will be discussed below.) The consent to be sued is generally limited only to negligent acts or omissions of government employees. Also, Congress has not consented to liability for punitive damages. (Title 28, U.S.C., Section 2674.) Further, Title 28, U.S.C., Section 2680 lists several specific areas in which Congress retained governmental immunity. Most of these 13 specific immunities seem to have no possible pertinence to BPA construction of a transmission line. The items most likely to become pertinent seem to be the continued immunities for claims for damages caused by the fiscal operations of the Treasury or by the regulation of the monetary system (subsection 2680(i)), for claims arising out of assault, battery, false imprisonment, false arrest, malicious prosecution, abuse of process, libel, slander, misrepresentation, deceit, or interference with contract rights (subsection 2680(h)), and the so-called "discretionary exemption." The discretionary exemption of subsection (a), Section 2680, Title 28 U.S.C., provides:

"The provisions of [the Federal Tort Claims Act] shall not apply to--

"(a) Any claim based upon an act or omission of an employee of the Government, exercising due care, in the execution of a statute or regulation, whether or not such statute or regulation be valid, or based upon the exercise or performance or the failure to exercise or perform a discretionary function or duty on the part of a federal agency or an employee of the Government, whether or not the discretion involved be abused."

In cases of assault, battery, etc., listed in the exemptions of subsection (h), although the government would be immune, there would be no immunity for any individual BPA employees who were guilty of such practices. The Federal Tort Claims Act provides statutes of limitations for tort claims against the government. The claim must be presented to the responsible agency within two years after the claim accrues. (Title 28, U.S.C., Section 2401.) The agency to act within that period is taken as a denial, allowing claimant to sue. (Title 28, U.S.C., Section 2675(a).) Suit must be commenced within 6 months of the claim. (Title 28, U.S.C., Section 2401(b).)

The liability of the government in the most important field of torts, that of negligence, is spelled out in the provisions of the Federal Tort Claims Act (28 U.S.C., Section 1346(b), 2671-2680). This Act provides that the United States shall be liable for

. . . "personal injury . . . caused by the negligent . . . act or omission of any employee of the government while acting within the scope of his office or employement, under circumstances where the United States, if a private person, would be liable to the claimant in accordance with the law of the place where the act or omission occurred."

In general, the Federal Tort Claims Act makes the Federal government liable to the same extent as a private citizen in terms of ordinary negligence tort liability. Thus, for example, BPA's liability for health impacts, if any, would be comparable to the liability of Pacific Power & Light Company for health impacts from its electric service lines in the City of Kalispell, Montana.

From the legal point of view, at least two factors must exist before BPA would be liable for health impacts. These two factors are called "causation" and "negligence" by the law. The government, like a private citizen, is liable only when its negligence has caused an injury.

Thus, in the instant situation, some person must suffer a personal injury or illness that is actually caused by the transmission line or its construction. The government could be liable only if the injury or illness was caused by the line or by the construction of the line. Thus, one who is injured by a government construction vehicle could show that he had sufferd an injury caused by the construction of the transmission line. In the case of an individual claiming some disease, such as a respiratory or coronary illness, he would have to show that his illness came from the transmission line or its construction. The routine way of doing this is to hire a physician or other expert witness who will testify that the illness was caused by the government activities in connection with the transmission line or its construction.

The other factor which is necessary to government liability is negligence. The government can be liable under the Federal Tort Claims Act only when the government's conduct which causes the health problem is found to be negligent. Without negligence, BPA would not be liable. Negligence is defined for individual State situations by State law. Whether some government conduct is, or is not, negligent must be determined in each situation by the particular facts and is adjudged on the basis of whether the government failed to act as a reasonable prudent person would have acted under the same or similar circumstances.

The probability of a valid claim against BPA for health impacts as a result of the construction of the transmission line in Montana can be estimated to be the same as for the construction of other transmission lines. Except as to vehicular and construction accidents, BPA does not know of any such claim. The claimant, if any, would have the burden of proving that the government was negligent and that such negligence caused the claimant's health problem. The United States District Court for the District of Montana would make the determination as to whether BPA was liable in the case of Montana.

36. <u>Comment</u>: As part of this response, please explain for me the effects the lines might have on Mineral County's law enforcement radio communications.

<u>Response</u>: The line will have no effect on Mineral County's law enforcement radio communications. Interference due to transmission line corona occurs only during rainy weather and is usually limited to within 600 feet of the line even when broadcast signals are weak. In rare instances, the police vehicle may have to drive several hundred feet from the line to enable communication. This would only be during rainy weather and when the police vehicle is far from the base transmitting station, such that signals strengths are low, and communications would be difficult even if the line were not there.

37. <u>Comment</u>: You have no idea of the long-range health effect due to . . . the defoliants you intend to use in forested areas.

<u>Response</u>: The statement on page IV-8 of the EIS ("No present evidence indicates that any harmful effects to humans or animals have occurred from exposure to herbicides in BPA's Vegetation Management Program.") is substantiated by detailed evaluations of BPA's various herbicide formulations appearing in the Final EIS on BPA's FY 1981 Program (DOE/EIS-0060). That EIS (which is incorporated by reference in this EIS on the Garrison-Spokane 500-kV Transmission Project) discusses the general toxicological considerations of BPA's herbicide formulations (acute and chronic), drift, volatility, absorption, leaching, microbial breakdown, chemical breakdown in soil, chemical breakdown in plants, and photodegradation. Copies of the EIS on BPA's FY 1982 and FY 1983 Vegetation Management Programs are available upon request.

# II. I. PUBLIC VERSUS PRIVATE LAND AS A SITING CONCERN

Many commentors expressed opinions about what concerns should have priority in deciding where to site the line. One "umbrella" issue included many of those concerns: the issue of whether to site the line more on public or more on private land. Because so many different concerns came under this heading, the issues are summarized at length below as one major comment. See also Part II. C for related discussions.

1. <u>Comment</u>: Those who advocated placing the line on public land often felt that public projects belong on public land. Many also felt strongly that a transmission line--and particularly a line of this magnitude--should be kept as far as possible away from people and residences (and thus from private land). Reasons cited include fears for long-term biological and electrical effects on people and livestock, fears of property devaluation and other negative economic impacts, concern for esthetics, and concern for impairment of orderly land use development. Where the line would follow existing corridor (private land), people felt that further visual impairment would be "the last straw." They also were concerned that federally built facilities would pay no taxes to the counties, an additional economic impact (revenue foregone). These arguments were given additional force where people perceived that much or all of the power transmitted through the lines is going elsewhere.

Those who opposed placement of the lines on public land often felt that the values of that land--especially esthetically appealing backcountry and mountainous areas--were important to many people, including and going beyond particular landowners. Many saw placement of the line in existing corridors--which tend to follow valleys, and hence, private land development--as a means to protect and preserve valuable natural resources, including unique esthetic qualities of the environment, wildlife, vegetation, timber, and opportunities for special recreational experiences. In the case of this project, they pointed out that Plan A (Hot Springs), which follows the existing corridor (more private land) is less costly, more economical. They also argued that the esthetic impact of an additional line in an existing corridor is less than the impact of opening a new corridor.

<u>Response</u>: BPA policy has been to parallel existing rights-of-way wherever possible. For this project, such a parallel route (the Hot Springs Plan) was developed, with a second plan variation through Plains, Montana. However, these originally proposed routes met with considerable public opposition, in large part because of their impacts on people and consequences for private land. Results of public involvement and of active and increasing Congressional interest in reducing those impacts led to the development of the Taft Plan, which reduces the amount\* of private land crossed:

|             | Private | Public |
|-------------|---------|--------|
| Hot Springs | 2/3     | 1/3    |
| Plains      | 1/2     | 1/2    |
| Taft        | 1/3     | 2/3    |

Although no choice to site the line on public land was directly built into the analysis of alternatives for this project, numerous ranking factors--including esthetics, urban/residential, other social, and social inconveniences--include private land crossed as one of their indicators of impacts. Where social and economic concerns became driving factors, routes with greater proportions of public lands tended to be preferred.

\*approximate proportions

However, it is virtually impossible in this study area and for a line of this length to locate a transmission line solely on public land or no closer than one mile or even one half-mile from any residence or community. Building a line between Garrison and Spokane necessitates crossing numerous river valleys, most of which have concentrations of private land and are dotted with settled areas. The possibility of future reinforcement to a populated area (i.e., Missoula), also requires a location reasonably close to the load center. Physical constraints, such as terrain, engineering factors, or snow and ice loading, and need for access to the right-of-way, are other factors which enter into the location process. Because of the impossibility of staying out of all valleys and off all private land and away from all residences or developed land by an absolute distance, the approach was to locate routes which would have the least possible effects on people while balancing the other locational criteria. The alternative routes studied reflect this approach.

# II. J. PROPERTY VALUES/COMPENSATION

The property value comments varied from questions about possible devaluation to statements about the specific reasons for devaluation to concern about a specific piece of property that could be devalued.

Many commentors felt that much of the value of property in the area is derived from scenic beauty of the environment. They maintained that a transmission line would detract from the environment's scenic beauty and would therefore devalue local property. Other commentors felt that the line's potential health/safety and inconvenience effects could also serve to devalue property under, adjacent to, and near the line.

Several commentors stated that landowners who currently had land for sale near many of the proposed routes had been unable to sell it because potential buyers were wary of purchasing land where visual amenities were so uncertain. Other commentors stated that the line would severely limit the developability of subdivisions.

A few people asked questions about BPA's appraisal practices; others felt that BPA should purchase affected parcels in full rather than simply acquire an easement across a portion of a parcel. A few people stated that BPA had attempted to bypass the property value concern in the EIS as being controversial and unproven.

In addition to the comments described above, a few people also made observations such as "Their [BPA] idea of a fair price and the landowner's idea is mighty far apart." Others made statements such as "No amount of money can replace the damage that would be done to my land." Finally, one or two commentors stated that because people would be paid by BPA for easements, they had no basis for complaint. 1. <u>Comment</u>: When a transmission line is located on land, it devalues the property because of its unpleasant visual characteristics and because of the annoyance and inconvenience of living and working around the line. This devaluation should be quantified and included as a cost of the project.

Response: The reasons given as to why a transmission line could devalue a parcel of land are: location, noise, visual, economic, social, health, danger, and so on. The reasons are just as varied as there are individuals who own, sell, or buy land. Many feel that they are being deprived of the anticipated appreciation of their land due to a change in the land's highest and best use. For example, the potential of farmland that could be subdivided for residential purposes in the foreseeable future could be reduced.

A property may have a special use which is created and maintained by the owner and, if so, is reflected in the overall land value at the time of evaluation. Such things as the owner's personal attachment to the land, for whatever reason, are not necessarily reflected in the land's marketability.

Property appraisals consider all the factors that create and maintain value. The appraisal reflects what the real estate market is doing in a given area as of a specific date. The estimated just compensation (market value) for a perpetual right-of-way easement, over and across a particular parcel of land, is based on what sales of comparable properties in the vicinity of the subject (or this ownership) has sold for within the recent past. The real estate market is dynamic and ever-changing and the value of land is also ever-changing.

As noted in Appendix D, "Social and Economic Considerations," p. 2-17, an extensive literature search on transmission lines' effects on property values did not yield conclusive evidence about whether these effects occur. Much of the literature reports that transmission lines have little or no effect on property values. A smaller number of studies reported somewhat reduced values for residential property. To date, no studies have shown any appreciable effect on residential property value at distances greater than 500 feet from the line.

If there are adverse effects on residential land values, they would be concentrated near the line and their extent would be influenced by the orientation of a property with respect to the line and opportunities for vegetative or topographic screening.

Because so much uncertainty surrounds land value effects, it is not possible to determine whether they exist and, if so, to what extent. Hence, it is not possible to forecast what BPA's easement payments would be in a particular area or incorporate these payments into the overall cost of the line.

2. <u>Comment</u>: In an area where people place a premium on scenic beauty and tranquility, a transmission lines' visual, health/safety, noise, and radio/TV effects would devalue property.

Response: The extent to which a new line would adversely affect land values has been addressed in several studies, but the evidence presented so far has been contradictory and inconclusive. For a more detailed discussion of land value effects, please see the response above and Appendix D, "Social and Economic Considerations," p. 2-17.

3. <u>Comment</u>: We have land for sale along an existing corridor and along a proposed corridor through which the proposed Garrison-Taft line could run. Potential buyers have exhibited reluctance to purchase the land because they are aware of the possibility of the line being constructed in the corridor. When a final decision is made about the lines' location, property values in the area selected will decrease.

<u>Comment</u>: We are opposed to the power line being built near homes. The power line as proposed would be in close proximity to a number of families. On the route now being considered the power line would only be about 100 yards from our home. We feel that not only would it affect our lives healthwise and noisewise, but would devaluate our property drastically which has been for sale since August 1980 previous to this decision.

<u>Comment</u>: Should I ever need to sell my new home, [in upper Rattlesnake] having the power line so close to it would definitely reduce its value.

<u>Response</u>: In the open market, buyer reluctance can be attributed to a number of factors. Uncertainty of the location of a proposed facility such as a transmission line may be such a factor. Although a number of studies has been conducted regarding changes in property values due to proximity of transmission lines, the results have been contradictory. (See response to previous comment.) There is no scientific information that would allow detailed quantitative prediction of land value changes induced by transmission lines or by the prospect of transmission lines. Land value effects are perceived differently by different buyers and case histories of many land sales must be examined before it can be concluded that a particular entity, such as a transmission line, has decreased land values or is solely responsible for buyer reluctance.

Studies on the effect of transmission lines on property values disagree as to whether the presence of the line reduces property values. Some indicate that property values are not noticeably affected. However, effects vary widely for different types of land crossed and impacts can vary for individual pieces of property in a single land use category. In general, the effect on property values depends on the type of land use near the line, on the intrinsic value an individual landowner attaches to the characteristics of his or her land, and on the changes made by the transmission line and right-of-way. Thus, an analysis of each individual case would be necessary to predict changes in property values for a particular line, as the effects are unevenly distributed.

Property owners are compensated for any reductions in the value of their land which occur as a result of the right-of-way easement agreement they enter into with BPA. Compensation is based upon the difference between the fair market value of the property before and after the establishment of the right-of-way.

These market values are determined in appraisals made by experienced BPA or independent real estate appraisers. Each estimate is examined by a review appraiser to ensure that it is written in accordance with the "Uniform Appraisal Standards for Federal Land Acquisitions" (Interagency Land Acquisition Conference 1973). Each appraisal must be supported by recently consummated comparable sales in the area which are compared with the property being evaluated.

It is recognized that, in some instances, the imposition of a transmission line right-of-way may so adversely affect a particular parcel of land as to leave the owner with an uneconomic unit. BPA's appraisers are alert to possible damage to portions of the ownership exterior to the transmission line easement.

Each property is evaluated and considered individually in arriving at a figure for just compensation to affected property owners. If the affected property owner voluntarily sells the land or an easement to it, there is prima facie evidence that he is satisfied. If a settlement must be reached in the courts, the courts will adequately compensate the owner for any fair market value loss.

4. <u>Comment</u>: We the undersigned residents of Mineral County, are strongly opposed to the placement of the Bonneville Power Administration's 500-kV power line in Mineral County. The negative impacts on land values and the tax base [among other factors] . . . make the "southern route" [Taft Plan] totally unacceptable to us. [Petition with 79 names].

<u>Response</u>: In Mineral County, the scarcity of private land and its tax base implications make potential land value effects a very sensitive issue. Although the evidence on transmission lines effects on land values is not conclusive (see Appendix D, p. 2-17, and the response above), a significant decrease in land values could adversely affect the County by reducing its tax base. However, very little private land would be affected by the line in Mineral County. Effects on land values and the tax base are likely to be negligible.

Although the potential for land value effects is one subject of controversy among local residents, the Taft Route affects the least amount of private land and thereby would have the lowest potential for land value effects.

5. <u>Comment</u>: I and many others have a considerable investment in real property in the impact area of the power lines. The studies mentioned in your draft EIS state that there is no conclusive evidence of real property devaluation on or near power lines' rights-of-way resulting from power line construction. I conducted a local area survey on this matter, the results of which make your nonconclusions to be vague and misleading at best. I surveyed local realtors, prospective rural acreage buyers, developers, and property owners along existing similar transmission lines. The result was that for this area, power line construction would result in major devaluation of nearby real property. <u>Response</u>: As noted on p. 2-17 of Appendix D, "Social and Economic Considerations", an extensive literature search was conducted regarding the effect of transmission lines on property values. The studies reviewed exhibited a wide variety of methodologies which ranged from informal surveys of developers and landowners to statistical samples of property sales near transmission lines. In general, most tended to conclude that transmission lines have little or no effect on property values. However, some concluded that transmission lines adversely affect nearby residential property values.

Since past studies were conducted in other geographic areas and not in the Pacific Northwest, there is a need for research in this region before conclusions can be drawn. Further research may yield more applicable conclusions about land value effects, including causes, when they occur, how long they last, their relationship to proximity to the line, and ways to reduce or avoid them.

6. <u>Comment:</u> . . .In Appendix D, "Social and Economic Considerations." A summary of corridor residents' perceptions on page 2-5 lists seven major concerns including ". . .concern about transmission lines' effects on property values." Page 3-8 further defined the property devaluation issue. Yet only one paragraph on page 2-17 and a few lines on page 4-14 and 4-17 are devoted to this "major concern." In essence BPA attempts to bypass the concern as "controversial" and "unproven."

Response: The concern over whether property is devalued by a transmission line and its right-of-way is listed prominently in the EIS SUMMARY as a subject of controversy, under the heading of <u>Economic Impacts</u>. Research was conducted to determine what was known on the subject of property value changes induced by transmission facilities. In Appendix D, "Social and Economic Considerations," property value issues are dealt with from both a social and an economic perspective. As noted on pages 2-5 and 3-8, local residents were extremely concerned about the project's potential effects on land values of properties located in or near the transmission line right-of-way. Because of these concerns, Mountain West Research, Inc. (the team's socioeconomic contractor) undertook an extensive literature review of previous research on transmission line effects on property values. (See previous comments and responses for results of this research.) Detailed prediction of potential property value effects was not attempted because the data is not conclusive enough to allow reliable assessment of possible impacts.

However, because residents' concerns about land value effects will continue to remain an important social issue, this fact was noted in the social impact section on pages 4-14 and 4-17. Furthermore, two impact measures were used to incorporate concern about land value effects in the analysis. These measures favored routes which cross less private land and come near fewer private landowners. Hence, although it was not possible to predict whether or in what magnitude land value effects would occur, the socio-economic assessment recognizes the importance of the issue and its route-ranking procedure explicitly favors routes which might have less potential land value effect. 7. <u>Comment</u>: The impact of these powerlines on the real estate value of our land and homes is not addressed under the Taft Plan, p. IV-62, "Socio-Economic Considerations."

<u>Response</u>: The environmental consequences of developing the project are discussed in two parts: a general impact evaluation for each subject of concern and route-specific discussions of the noteworthy impacts associated with each alternative. Potential land value effects are addressed primarily in the first (general) part of Chapter IV: ENVIRONMENTAL CONSEQUENCES (Volume I). Transmission lines' potential effects on the real estate value of land and homes is not addressed under plan-specific discussions in Chapter IV because an extensive literature search on land value effects did not yield conclusive evidence about whether or in what magnitude land value effects occur. (See responses to comments above and Appendix D, p. 2-17.)

8. <u>Comment</u>: . . . I am not in favor of the proposed BPA power lines and specifically, I am not in favor of the Bonneville Power Administration power line crossing my property [Segment 119]. I have lived on my ranch for thirty years. I was aware that it had a federal power right-of-way on the property, and I was prepared to live with what was there when I moved on the property. However, not in my wildest dreams did I imagine that a power line of the proposed size would ever be built in my backyard. The proposed 500-kV lines are larger then anything I was prepared to accept. It is my opinion that this installation will greatly depreciate the value of my property.

<u>Response</u>: The existing right-of-way through which segment 119 would pass is wide enough to accept an additional 500-kV transmission line. Hence, BPA could install a line in the right-of-way without acquiring additional right-of-way. The extent to which a new line would adversely affect land values has been discussed in the responses above.

9. <u>Comment</u>: Another major effect, adjoining property values will be greatly reduced as a result of the power line. No mention is made in the report of this or of any possible compensation because of the visual blight resulting from construction on property owners that are not actually on the corridor itself. This will, in the long run, dramatically reduce land values and adversely affect the economic health of the community and more so as additional power lines are constructed on a corridor or the size of the existing towers increases. This effect is exponential, that is, double the number of lines more than doubles the impact.

<u>Comment</u>: Property owners who own land adjacent to but not in the right-of-way should be compensated for property devaluation.

<u>Response</u>: Although the Garrison-Spokane Transmission Project would have adverse visual impacts on people who view the line from nearby, non-adjacent land, BPA is not legally able to compensate the owners of this land. Many residents of Western Montana feel that property values on non-adjacent lands would be reduced as a result of their visual proximity to a transmission line. The results of research done in other areas is contradictory and does not provide conclusive evidence on whether or to what magnitude transmission lines may change nearby property values. Appraisals prepared for the Bonneville Power Administration, as for any other Federal agency, must be prepared in accordance with "Uniform Appraisal Standards for Federal Land Acquisitions". Federal law prohibits any consideration of Just Compensation for consequential damages to adjoining ownerships.

10. <u>Comment</u>: Compensation to the forest landowner as a result of reducing the resource land base is also inadequately discussed in the DEIS. Payment should be based on both loss of existing timber and loss of use of the land for future timber management.

<u>Response</u>: The compensation for a transmission line right-of-way over and across forest land is based on the land value (including reproduction stocking), plus the value of the timber, less a residual land value. This approximates the full fee value for the land and trees. The imposition of a transmission line easement changes the present highest and best use. The land can be used to grow Christmas trees or nursery stock. The market value paid for the land and timber includes the right to grow future forest products. The one-time payment does, in effect, consider the future loss of forest land to the owner.

11. <u>Comment</u>: The specific portion of this [Plan C] to which I am opposed crosses section 4 and 9 in T8N and R13W in Granite County, Montana. This line will cause great economic hardship by interfering with our future mining operations in this area. This area has been mined extensively in the past and will again be mined when the economy improves. Your route crosses directly over patented mining claims with one of the towers located in the middle of one of these claims. This crossing will result in the majority of the mining claims becoming sterilized. The lost revenue due to the in-place ore not being mined can easily run into the millions. An extensive diamond core drilling program would be needed on your part to define the exact limits of the extensive core veins and ore pockets. This drilling will cost you from \$250,000 to \$400,000 if properly done. If this drilling is not done, there is no way you can legally or legitimately determine the fair market value of the power line right-of-way across these patented claims.

<u>Response</u>: Compensation for a transmission line easement across a mining claim is based on the present market value of the property. The appraisal includes the land and mineral value. The appraisal of mineral value is conducted by a geologist and/or a mining engineer and includes taking samples of the material found on the claim. The line's impact on a claim depends on whether a tower is located on the claim or whether it is simply crossed by a conductor. Fair market value can be determined for any mineral claim.

12. <u>Comment</u>: I talked to Mr. Eskridge about the method of compensation for tower sites on private property, and on my particular ranch, I'm blessed with seven towers, part of them 230 wood post, part of them is Bonneville Power's 230 steel. In any event, I think tower sites cost a man that's trying to farm around. Five of them are in cultivated fields. They cost you money every year. They cost you frustration. I could go on and on, but I felt my feeling is instead of a one-time payment and a life-time problem, that these sites

ought to be on an annual lease basis. In other words, you should be compensated for the problems that the particular individual is caused by the site, and, at that time I discussed with George, he said he thought it was a reasonable consideration, and that they would probably discuss it some more. Has anything ever progressed further on that?

<u>Comment</u>: Adequate compensation for easements must be established on other than a one-time per-acre payment basis. Property devaluation, loss of agricultural productivity, loss of flexibility of mining operations and aesthetic impact are examples of the other factors which must be considered in determining adequate compensation.

<u>Comment</u>: Payment for the power line, . . . I think it should be renewable every five years and as the property's value goes up, so does the money that you pay the landowners.

<u>Comment</u>: BPA's land payment policies should be discussed. Is BPA forbidden from making annual payments or is it current practice not to make them?

Response: Inconvenience effects to landowners have been discussed in the EIS (see Chapter IV). Such effects are considered as part of the environmental assessment process and in comparing alternatives.

Compensation, in the form of a lump sum payment, for a perpetual transmission line easement is considered fair and reasonable to both the landowner and the government according to standard government practices. The appraisal considers the effect of the transmission line on the property as a whole and how it affects the highest and best use of the land.

The annual payment or specified adjustment every 2 1/2 to 5 years has been proposed; after consideration, BPA maintains that the one-payment concept is more valid and appropriate. Implementing a periodic payment plan would be expensive because of the miles of transmission line, the number of parcels in private ownership, changing land uses as well as landowners, and setting up a formula for such payments. This will also adversely affect the ratepayers of the region because the cost of implementing an annual payments program is passed on to the ratepayers.

13. <u>Comment</u>: BPA should adequately compensate landowners for transmission line rights-of-way. In cases where the entire parcel is devalued, BPA should pay the owner the fair market value of the entire property.

Comment: Private landowners should be given the option to sell their land to BPA rather than simply grant BPA an easement. In these cases the private landowner should also be reimbursed for moving costs. If necessary, BPA should approach Congress for permission to make outright purchases.

<u>Response</u>: BPA is only authorized to purchase that land actually needed for the project unless imposition of the transmission line leaves an owner with an uneconomic remnant. If the occasion arose where we did purchase an entire ownership, as for a substation, we would indeed reimburse for moving costs and other expenses as well. As for Congressional authority, it would be difficult, especially in the present political climate, for an agency to make much of a case for taking large pieces of property out of private ownership when they were not needed for a project.

14. Comment: What is the term of the easement?

<u>Response</u>: The term of the easement is perpetual and thereby applies for an unlimited length of time.

15. <u>Comment</u>: The BPA must be responsible for any land damage, gates or fences and be held responsible to restore it to the original state.

<u>Response</u>: BPA pays crop damage and restores the land to its original state, including reseeding, and repair of any damage to gates and fences damaged during construction.

16. <u>Comment</u>: How does one get BPA to appraise [property]? What steps do you have to take?

<u>Response</u>: The landowner does not have to ask that the government make an appraisal. This will be done as a matter of course after the property has been surveyed and a description of the property is available to the appraiser.

17. Comment: BPA's land appraisal practices should be discussed.

Response: All Federal agency appraisal practices including those used by BPA are guided by standards cited in the publication <u>Uniform Appraisal</u> Standards for Federal Land Acquisitions. This publication is available at any of BPA's offices. In addition, our work is subject to review by appraisers of the Department of Justice.

Many private appraisers also use the above noted publication as a guide in their work. In easement appraising, the most important consideration is the highest and best use of the property before imposition of the easement and the highest and best use after imposition. The difference is the estimate of just compensation. Before and after values are based on the value of other property similar to the subject property.

18. <u>Comment</u>: . . . I am extremely upset by the possibility that a 500-kV transmission line is proposed to cross my property in Missoula County. The property is first and foremost a recreational acreage (but with no timber potential) and nothing could be more distasteful to me or any future owner than a powerline crossing the property. The distinct implication in your letter is that should this route be selected, I will in some measure be compensated by means of an easement. Though the route is planned to cross only the northern edge and northeast corner of the property, its value to me or anyone else is diminished to virtually zero--it might as well run through

the middle. I therefore insist that should this route be the final one, that I be compensated fully for the entire fair market value of the property.

<u>Response</u>: As discussed above, the compensation for the 500-kV transmission line easement on your property would be based on the difference between recent sales of similar land before and after imposition of a transmission line easement. If the market data shows no "after" value then the just compensation will reflect the entire fair market value of your property.

19. <u>Comment</u>: Our range for our cattle will be affected by the lines and towers and roads. We'll have to ride under them and around them six months out of the year. Definitely the line will be a detriment to the value of the property and the scenic value of the entire area. The noise, interference, and electric fallout from these lines will be much too close for comfort!

Response: To our knowledge, the transmission lines do not have an effect on the livestock using the land. (See Part II. H of this Volume for further discussion.) The tower locations may affect your farming practice, (see Part III. C) but the transmission lines are designed to keep the noise, interference, and electrical effects well within the National Electrical Safety Code standards.

20. <u>Comment</u>: We are deeply concerned with what this transmission line will do in depreciating land values, especially irrigated meadow lands. We note that one of these better irrigated ranches would be given away with this monstrous line cutting through the middle of it. We are sure it couldn't be sold to us. Most of the people with the better irrigated ranches have spent a lifetime of work and savings to put them together and for Bonneville to come along and cut the value fifty percent and render it [un]usable is absolutely cruel and unjust. This 500-kV line must not be allowed to cross this type of land in lower Flint Creek Valley.

<u>Comment</u>: When a tower or towers interfere with an irrigation system, sprinkler system, or otherwise, what happens then in our values?

<u>Response</u>: Any change in the irrigation system is considered in the appraisal process. The appraiser looks at what happens to the present irrigation system and estimates the cost to cure the problem. The added farming costs are also considered in the final estimate to be paid for the right-of-way easement.

21. <u>Comment</u>: We don't feel that BPA has given the proper consideration to the private landowners. They have gone on private land without permission or signed easements. The compensation they are offering is unacceptable when you consider the damage that is being done.

Response: BPA is not aware of incidences of trespassing by its employees. We secure signed permission to survey forms before authorizing surveyors to enter. BPA is not currently negotiating easements for the Garrison-Spokane Project. This comment may refer to the landowner's expectation of compensation once a final route is selected and right-of-way negotiation begins.

22. <u>Comment</u>: I suggest that the Bonneville Power Administration contract with an outside, disinterested third party to provide our landowners with the series of model contract to make clear to each individual landowner of their opportunities to modify the contracts to account for all the special considerations that each individual party feels they should have and are reasonable. . . When it is the taxpayers' dollar who is initiating the developing public works projects, then the government has a clear responsibility to protect the individuals' rights and the communities' interest. . . In other words, BPA has a special obligation to protect local interests.

<u>Response</u>: BPA must follow Department of Justice procedures in the type of legal document it obtains. However, individual owners will have the opportunity during negotiations to work out special terms and conditions acceptable to both parties.

23. <u>Comment</u>: Eminent domain is an undesirable practice and should not be used as a threat by BPA. When it is used, it should be used fairly so as not to interfere with private citizens' enjoyment of their property. Private citizens who must pay for lawyers and bear the cost of going to court are unfairly burdened in eminent domain proceedings.

<u>Response</u>: Bonneville's acquisition policies follow uniform Federal legal guidelines designed to ensure that assessment of property is fair and impartial, and that the easement necessary for a right-of-way is properly compensated. BPA uses eminent domain only as a last resort and makes every effort to reach a negotiated settlement. However, BPA's ability to invoke eminent domain may be perceived as a threat by local landowners.

24. <u>Comment</u>: BPA should provide affected landowners with better notice of their intent to survey. BPA should notify all landowners adjacent to but not in the proposed rights-of-way.

<u>Response</u>: It is BPA policy to obtain the signature of the person in possession of the property on a document granting the right to enter the property and perform a number of actions, including surveying. No surveyor is authorized to enter property unless such a document has been signed or the rights have been obtained through the courts.

Adjacent property owners are advised of BPA plans through the public involvement process (See Part II. G. 1). It would be difficult to individually contact every landowner who lives near to but not in the proposed right-of-way.

25. <u>Comment</u>: . . . I'm a farmer in the Rathdrum area where the existing transmission line crosses our property. . . We understood clearly that the easement purchased at that time would compensate two additional lines for the future. But, . . . [I feel] that we have lost more than we were compensated for at that time. Even though the Bonneville Power Administration has a

present easement for more lines, . . . I would like to ask that reasonable consideration be given for the cost of the second line that would be equitable as if they were building a new line in an area where you do not have the easement.

<u>Response</u>: When a new transmission line is constructed in an existing right-of-way, the landowner is compensated for agricultural losses. We will consult the landowner regarding tower placement and any additional access we may need to acquire for the new facilities. However, Federal regulations do not allow us to re-purchase rights which we already own (i.e., the existing right-of-way easement).

26. <u>Comment</u>: Each landowner deserves to know the loss on land values in dollar amounts.

<u>Response</u>: Each owner whose land is taken for the easement is informed of the reduction in value of the affected property due to the imposition of a transmission line easement. In these cases, the value or compensation for the loss in value is estimated by a qualified real estate appraiser. As noted in previous responses, it is not possible to forecast land value effects on property not actually in the easement.

27. <u>Comment</u>: The power line also in Nebraska that he told us about, he said that they were compensated one thousand four hundred dollars per unit for this. I understand that this is far below what we have been offered here. I don't think this is fair. . . .

<u>Response</u>: The payment made for an easement in one state is not the basis for estimating value in another state. (There are specific instances of this happening but generally only for special purpose land uses.) In the case of this project, there are adequate comparable sales of the land uses that are similar to those over which the transmission line crosses. These sales are reflective of the local real estate activity. Appraisals based on this method reflect the loss that may be suffered due to the project.

28. <u>Comment</u>: Additional data is needed on landowner compensation, construction procedures, and long-term social impacts of communities affected.

Response: All of these concerns are dealt with in Volume I in Chapters II and IV, which have been rewritten for this final document. Additional, more detailed information can be found in the comments and responses in this volume, in Appendix D, "Social and Economic Considerations", and also in references cited in that document.

29. Comment: A question came to mind concerning fire caused by damage to power lines, electrical storms, a la the Pattee Canyon fire in Missoula. There was a very lengthy lawsuit involved with that before the thing was resolved. If there was a set of circumstances that created a fire which burned peoples' homes, damage their forests, which have a value, and so forth, would they be facing similar lawsuit, or does BPA have a system already established for compensating people, . . .

<u>Response</u>: It is highly unlikely that this line would ever start a fire. However, the United States is responsible for any loss or damage or injury to persons resulting from any acts or omissions, in accordance with the provisions of the Federal Torts Claims Act 62 Stat. 382, as amended. (Also see part II. H, comment #35.)

30. <u>Comment</u>: Do estimated costs for the line include costs for timber taken out of production?

<u>Response</u>: The appraisal process considers all factors that create and maintain land values. Estimated land costs include the value of the property <u>plus</u> the value of timber, including the right to grow future crops. If the land's highest and best use is for timber production, then costs of timber taken out of production are included. We estimate the market value of the stumpage.

If the land has a higher value for recreation, homesites, agricultural use, etc., than for timber production, then the timber is valued only to the extent that it enhances the land's value.

31. <u>Comment</u>: Can we assume that BPA will live up to its promises as stated in the draft report? I seriously doubt it, as past experience with utility construction through our valley has been anything but good. . . I've also had discussions with many of my neighbors that had experience with the BPA, and generally they concur that at this stage of the review process, a great many promises are made that are, in fact, not lived up to. These largely relate to the construction procedures, levels of compensation, return of the terrain and the environment to its original condition all with minimal amount of hassle and responsibility for the landowner. In many cases, this is not the way it's turned out.

<u>Response</u>: BPA is obligated to fulfill any conditions agreed to with landowners in the right-of-way easement negotiation process for constructing facilities on their property. Monetary compensation is determined through negotiation with the landowners or as a last resort through condemnation proceedings in the Federal courts.

32. <u>Comment</u>: The destruction of all the timbered land that would have to be cut for corridors and access roads would be devastating and absolutely unnecessary. Also, obtaining easements for a new route is time consuming and expensive.

<u>Response</u>: BPA recognizes that transmission lines located in forested lands will affect those lands. It is not practical to try to bypass all forest land in siting a line because of excessive costs. Rights-of-way acquisition is generally time-consuming and expensive. This is why all options are studied closely before a final route is selected. More information on forest land removed from production is in Chapter IV, Volume I.

33. <u>Comment</u>: I would offer the observation that when a public entity does obtain property for some purpose of easements and then they find that they

Garrison-Spokane EIS Wg1815E:02-08-83

aren't really going to use the easement or the property, that it probably would be best to relinquish the easement or return the property to the public domain, whichever the case might be.

<u>Response</u>: BPA agrees that in cases where easements aren't going to be used for the purposes for which they were acquired, they should be returned to the public domain.

34. <u>Comment</u>: What do you mean the established? Who established it? [the market price of property]... How about all these other factors that enter into it. He didn't have it for sale, he was going to run this land. I think by the time it gets to condemnation suits that maybe you better change your policies.

<u>Response</u>: Appraisers do not establish market price, but rather estimate the fair market value of the subject property by a comparison with recent sales of similar property. This is the standard procedure used by all appraisers, whether private or Government. The comparison includes adjustments for size, location, access, topography, improvements, and other factors that influence value in the market. The fair market value concept reflects a willing buyer and willing seller, even though not many landowners are willing sellers when their land is being acquired by a governmental agency.

#### II. K. TAXES/IMPACT AID

Commentors on tax issues and impact aid payments focused on the project's perceived effects on the local tax base and on several ways in which BPA could compensate local governments for tax losses due to the project.

Many of the commentors, noting BPA's tax-exempt status, stated that BPA's not paying taxes would be unfair because counties through which the Montana Power Company portion of the line would pass will receive tax payments. Several stated that BPA should return the project to the Montana Power Company who would pay taxes on it. In addition, a few other people made statements to the effect that BPA should compensate future generations for damaging their land or that BPA should compensate local governments for the revenues forgone because of BPA's tax-exempt status.

Others expressed concern about the project's potential adverse impacts on property values and consequent depreciation of the local tax base. Many noted that particular local counties had small amounts of private land and stated that any land removed from the tax rolls would have an adverse fiscal effect on local governments.

A few people expressed concern about the project removing forest land from production and the consequences for local counties' receipts from the U.S. Forest Service. A few others asked questions about the project's effects on any local law enforcement agencies that might be required to patrol new access roads. Similarly, a few people requested more information on right-of-way maintenance and fire control responsibilities, especially when new access roads might expose new areas to fire danger or where additional equipment might be necessary.

Many commentors suggested methods that could be used to compensate local governments for impacts and for revenues forgone because of BPA's tax-exempt status. Several people stated that the Montana Power Company should pay taxes on the BPA portion of the line. Others felt that BPA should make payments in-lieu-of-taxes, even if it would take an act of Congress to make such payments legal.

A few people recognized that BPA would be making some impact aid payments and requested more information about the amount of and time period over which these payments would be made. Others asked BPA to use impact aid payments fairly and flexibly to mitigate all impacts that could be attributed to the project.

1. <u>Comment</u>: I am particularly concerned about local residents whose lives and property would be affected by the lines and yet who are not entitled to payments under Bonneville's existing compensation policies. Every unmitigated local impact means shifting line costs from electricity consumers to local residents. Accordingly, BPA should relocate, redesign, and, if necessary, bury the lines to avoid high impacts. If Bonneville finds such activities to be cost-prohibitive, Bonneville should provide adequate compensation to affected residents and local governments--even if these residents and governments do not have property within the lines' rights-of-way. If Bonneville does not wish to use its discretionary authority to do this, it must return construction to private enterprise immediately.

<u>Response</u>: BPA concern for the lives and property of local residents is reflected in the environmental criteria, which incorporate numerous areas of human concern: lifestyle, esthetics, economics, residential avoidance, and so on. Our acquisition policies follow uniform Federal legal guidelines designed to ensure that assessment of property is fair and impartial, and that the easement necessary for a right-of-way is properly compensated. In addition, we have held several meetings in Montana to gather ideas and suggestions for impact aid payment policy development. We will carefully review and consider all these comments.

2. <u>Comment</u>: Because BPA is a tax-exempt Federal agency, they would not pay property taxes on the Garrison-Spokane 500-kV Transmission Project to local counties. We are worried about this loss in tax revenues and are concerned about local taxpayers having to make up the difference.

<u>Comment:</u> If the Taft Plan is adopted, I would like to state, based on some very quick figuring, that the cost, the financial cost out-of-pockets of these taxpayers in this county is twenty-two hundred and seventy dollars per year lost taxes that will have to be made up by the citizens of this county.

<u>Response</u>: If the project were being sponsored by a private, tax-paying utility, the total first-year property tax revenues to all counties are estimated to range from about \$3.9 million for the Hot Springs Plan to about

Garrison-Spokane EIS Wgl815E:02-08-83

\$5.5 million for the Taft Plan. These estimates are probably on the high side. In terms of absolute value, the largest possible revenue forgone in any single county would be \$2.6 million in Mineral County under the Taft Plan.

"Revenues lost" are different from "revenues foregone." If a private operator of a transmission line were paying taxes to the county, but then sold the line to BPA, the county would stop receiving the tax money. Property tax revenues would be <u>lost</u>. The county would have to make up those revenues elsewhere or reduce its expenditures. However, if a county <u>expects</u> that a private utility will construct a transmission line and the line is then actually constructed by a tax-exempt federal agency, property tax revenues would be <u>foregone</u>. The expectation of revenue would not be fulfilled. With the Garrison-Spokane Project, revenues would be foregone. Local taxpayers would not have to make up revenues lost from the county tax rolls. They would have to <u>forego</u> county revenues that would have been generated had the transmission line been constructed by a private utility taxed on its capital investment. County governments will not receive the positive fiscal impact. However, they should not experience negative fiscal impacts because of the line.

3. <u>Comment</u>: Alberton currently has the third highest taxes of any community in Montana, and Superior the fourth highest. This is a direct result of having eighty-eight percent of the county land in tax-exempt status. BPA's actions will reduce forest receipt funds, remove even more private land from the tax rolls and have as yet unclear effect on U.S. Forest Service payments in-lieu-of-tax payments to the county.

<u>Comment:</u> . . . U.S. Forest Service forest receipts funds provide a substantial portion of the county road and school budgets. These funds are dependent upon sustained yield forestry practices mandated by Congress in the Multiple Use Sustained Yield Act. The transmission corridor will be a swath one hundred thirty feet wide and roughly fifty miles long. This amounts to approximately eight hundred acres of land which is removed from timber harvest forever. This represents point one two five percent of the six hundred and forty thousand acres of Lolo forest land in Mineral County. Forest receipts have averaged roughly two million dollars per year, and removal of point one two five percent of the resource base reduces the amount of forest receipts by the same percentage or over twenty-five hundred dollars per year.

<u>Response</u>: Mineral County's Forest Service receipts are based on the county's National Forest acres as a percentage of total Lolo National Forest acres. These receipts have declined from approximately \$492,000 in 1977 to \$331,000 in 1982. Because the transmission line would not actually remove any National Forest land from Mineral County's inventory, it would not directly affect their receipts. In actuality, the 800 acres removed from production would affect the Forest Service receipts as a whole and the effect would be spread through several counties. Similarly, the forest removed from production by the right-of-way in other counties would also affect Mineral County.

Although it would be very difficult to calculate the exact impact the line would have on any county's Forest Service payments, it would certainly be less

than \$2,500, as the payments are derived by applying each county's National Forest acreage percentage to the total receipts earned by each National Forest having acreage in that county.

4. <u>Comment</u>: The BPA Garrison-Spokane Project would take land off the tax rolls, reduce local tax bases, and deprive counties of much needed tax revenues. These effects would be particularly severe in areas like Mineral County, which currently have very little private land in their tax bases.

<u>Response</u>: In most cases, BPA will acquire a right-of-way easement for its transmission line facilities. The land in the right-of-way would continue to be owned by the private landowner and would remain on the county tax rolls. The tax base would be lowered only if the assessed tax value of land in or adjacent to the line is lowered to below the appraised value (for tax purposes) due to the presence of the transmission line or substation facility. The Garrison-Spokane Project would take land off the tax rolls only when BPA acquires title to the land used for a line or substation from a private landowner.

5. <u>Comment</u>: Local counties [particular reference to Mineral County] will lose revenue from the project and from the tax base, which will be reduced due to property devaluation. This loss is unfair because the counties through which the Montana Power Company portion of the line passes will receive tax payments. In effect, BPA is depriving local counties of tax dollars to do the work of Montana Power Company.

<u>Response</u>: It is unlikely that the project would lower the existing county tax base, as discussed above. The issue of property devaluation because of a transmission line right-of-way easement is controversial; studies to-date are inconclusive regarding whether an easement would cause property devaluation. (See Part II. J) The property owner may request a reappraisal from the tax assessor, who may or may not grant a reduction in assessed value. General statements of property tax base devaluation are misleading because each case would need to be reviewed on its individual merits and the policies of the taxing entity.

As a Federal agency, BPA pays no taxes to State or local governments. Congress could authorize in-lieu-of-tax payments, but has not done so. There is a provision in the Regional Act for "impact aid payments" based on services provided the Administration. These are not in-lieu-of-tax payments but payments for impacts on local government services. For example: If a county must build a new facility, such as a road or school, as a direct consequence of a BPA action, BPA may help pay for it. The method for computing "impact aid payments" must be approved by the Federal Energy Regulatory Commission. Payments under this provision may begin in October 1983.

6. <u>Comment</u>: We expect a barage of tax appeals from people whose property is adjacent to the powerline. This will reduce the tax base of the County and increase the taxes of everybody else who already pay one of the highest taxes in the State.

Garrison-Spokane EIS Wgl815E:02-08-83

<u>Response</u>: Many people who own land in or adjacent to the proposed transmission line right-of-way feel their land would be devalued by the presence of the line. If they appeal the assessed taxable value of this land and it is consequently lowered, then the tax base of the County will be reduced.

7. <u>Comment</u>: If we're just going to become a power line corridor and energy corridor, I think we need some money to solve some of the problems, because I know a few of those fellows are going to get in a fight down at the bar and need a sheriff to come, and they're going to be housed in our hotel a few days, and I'm sure quite a few kids in school and these things, the local taxpayers have to pay for it, and they come to me, and they say, hey, we don't want this thing, so I think we ought to look into this a little more. I don't know if it's your responsibility or whose responsibility it is, but somebody should address it.

<u>Response</u>: BPA would pay for additional community government services required as a result of this project. These are called impact aid payments and are designed to offset or compensate for extra project-induced local government expenditures. In a 1981 survey of communities that had recently housed transmission line construction workers in the Pacific Northwest (Transmission Line Construction Worker Profile and Community/Corridor Resident Impact Survey Final Report), Mountain West Research, Inc. found that workers had very small, if any, adverse economic impacts on the local areas in which they lived. In general, community residents regarded transmission line workers and their accompanying family members as reasonably decent, well behaved, friendly people who placed little additional burden on sewer, water, school, medical, or law enforcement facilities and personnel. The workers did place important demands on local hotels, motels, and eating establishments. In virtually all cases, the communities regarded expenditures at these places as positive short-term contributions to local income.

8. <u>Comment</u>: BPA should provide more information on the amount of and time period over which impact aid payments will be made. Impact aid payments should be made fairly and flexibly to mitigate all impacts.

<u>Response</u>: Impact aid payments may not begin until the first fiscal year after approval of the payment formula by the Federal Energy Regulatory Commission, and adoption of a Regional Plan by the Regional Council. It is expected that payments may begin in October 1983. The first payments will also cover services provided since passage of the Regional Act (December 5, 1980).

BPA is continuing to work on the initial impact aid proposal to ensure that fair and flexible compensation policies will be instituted for this program. That revised proposal will be published in the near future. BPA must keep impact aid payments within the requirements set forth in the authorizing legislation, which relates formula payment to services provided concerning BPA transmission facilities. 9. Comment: BPA should make payments in-lieu-of-taxes, even if it requires an act of Congress to make these payments legal.

<u>Response</u>: Congress has not given BPA the authority to make payments in-lieu-of-taxes. We cannot make such payments until Congress authorizes them.

10. <u>Comment</u>: BPA should discuss right-of-way maintenance and fire control responsibilities, especially when new access roads require that new equipment be purchased.

<u>Response</u>: The impact aid payment formula will address what services are covered, and provide an equitable method of payment. Basically, any costs of services, including fire protection, incurred due to the transmission facility are to be repaid.

11. <u>Comment</u>: Would . . . Washington people be interested in payment in-lieu-of-taxes or do they have these transmission lines or facilities? Are we [Montanans] the only ones that are thinking in that term?

Response: Impact aid payments will apply to appropriate BPA transmission facilities throughout the Pacific Northwest Region. Washington, Oregon and Idaho also have such facilities, although they have not shown great interest in the subject to date. No payments in-lieu-of-taxes are presently authorized.

12. <u>Comment</u>: Local counties will lose revenue from the project and from the tax base, which will be reduced due to property devaluation. This loss is unfair because the counties through which the Montana Power Company portion of the line passes will receive tax payments. In effect BPA is depriving local counties of tax dollars to do the work of Montana Power Company.

<u>Response</u>: It is true that local taxing authorities will not receive any tax revenue because BPA is building the Garrison-Spokane segment of the Colstrip project. It must be remembered that the local taxing authorities are expecting loss of revenue because of BPA's tax-exempt status. At this point in time, no real loss has occurred. (See response to comment #2.)

If the government were to make payments equivalent to the private utility rate, the public would be taking tax dollars from one pocket and placing them in another pocket. Under the present arrangement, the ratepayer is the beneficiary by having reasonable electrical rates. BPA's role is to protect and enhance its electrical system so all the ratepayers are assured of a reliable electrical source throughout its operating region.

13. <u>Comment</u>: . . . County roads will be heavily used during the construction phase. This will cause physical deterioration and the need to spend more funds on maintenance and repair.

<u>Response:</u> BPA will compensate the counties for increased road maintenance and repair through impact aid payments.

Garrison-Spokane EIS Wg1815E:02-08-83

#### II. L. TECHNICAL CONCERNS/COST

Virtually all of the technical comments were phrased in the form of questions about some aspect of the project such as corridor dimensions, tower height, line sag, or construction techniques. Many of the questions about the construction process dealt with the use of heavy equipment and with the possibility of using helicopters to erect towers in certain areas. A few people asked about the possibility of consolidating the lines in the Thompson Falls-Plains area.

Many commentors asked about the maintenance of access roads and about removal of unneeded roads after the construction process is complete. Other comments related to the advantages and disadvantages of a.c. and d.c. and the possible conversion of the Garrison-Spokane project to d.c. in the future. Some commentors addressed transmission line losses, the placement of multiple lines on one tower, the life expectancy of the line, and system connections with The Washington Water Power lines. A few asked about the weather's effects on the line, and about the possibility of sabotage.

While a few people asked about the effects of the line on rates, most of the cost questions were strictly about the methods used to figure the overall cost of the line. Specific comments in this category dealt with the costs of consolidating lines, removing timber from production, surveys, microwave systems, and helispots. Others asked about underestimation of costs and about the effects delays could have on costs.

Information in response to many of these concerns is included in the EIS and various appendices. In particular, see in Volume I, Chapter I: PURPOSE OF AND NEED FOR ACTION, Chapter II: ALTERNATIVES INCLUDING THE PROPOSED ACTION, Table 2.1, and in Appendix E - "Underground Transmission Systems." Other more specific comments and responses follow.

### II. L. 1 Technical Concerns

1. Comment: I would like to know what the width of the siting corridor is.

Response: The right-of-way width needed for a double-circuit 500-kV transmission line is 125 feet. The "siting corridor" used in planning and for environmental analysis varies in width from about one to ten miles or more. It would be narrow in areas with land use or terrain constraints, and very wide in areas with few or no constraints. For more information, see Appendix A, p. 8.

2. Comment: People should have more say in which kind of towers go up.

<u>Response</u>: Choice in tower design is limited by the types of structures available for transmission lines of this capacity. Design clearances, availability of right-of-way, span length, and cost of structures influence the range of selection for transmission line towers. BPA is, however, studying tubular steel improved appearance designs for possible use in several environmentally sensitive areas. See <u>Mitigation Measures</u>, in Chapter II of Volume I. 3. Comment: I understand other property owners have objected to these towers and have been granted the wood type so I hope you will consider our wishes.

<u>Response</u>: Wood pole construction is not feasible from either technical or environmental standpoints for a line this size. Wood poles are not being considered for any portion of the 500-kV lines on this project. No promises have been made to any property owners to use wood poles instead of steel towers for 500-kV lines.

4. <u>Comment</u>: Concern was expressed about snow, wind, ice, and fire as hazards to the line. Concern was also noted that the line will attract lightning, thus causing more forest fires.

<u>Response</u>: Severe weather conditions such as wind, ice, and snow, are anticipated in some areas. In these areas, the line is designed to withstand such problems.

If a lightning storm develops in the vicinity of the line, the towers themselves (rather than the lines) will probably be struck first because they will be generally taller than the surrounding timber. They therefore potentially reduce the number of lightning-caused forest fires. The lines themselves are designed to withstand lightning strikes by channeling them to the ground through the tower.

5. <u>Comment</u>: What is the life expectancy of the line and what happens to it when the coal is gone?

<u>Response</u>: There is no established limit to the life expectancy of a transmission line. The lifetime use of a transmission line will depend on many unknown factors such as future changes in load centers, changes in generation, and so on. As stated in the EIS, the practical or economic life of the line is estimated at 39 years, although it is likely to have a longer life.

When the coal is exhausted, the line could be retired and the right-of-way easements relinquished by BPA. However, it is more likely that the Garrison-Spokane line(s) will be used to hook up and transfer other power flows, whether from east to west or west to east. Such actions are dependent upon a variety of factors, including demand and cost, and cannot be predicted with any certainty at this time.

6. Comment: What would happen to the powerline if it is sabotaged?

<u>Comment</u>: . . . Another big concern that should be seriously considered is the heavy use of the area by riflemen and hunters. While most of them are good citizens, there are those among them that will shoot at or destroy anything, which is evidenced by the buried powerlines of which the riser boxes have been almost destroyed by rifle fire. This area is very accessible to town, but remote in its nature, therefore, encourages this type of activity. What a better target than a huge, ugly powerline! Garrison-Spokane EIS Wgl815E:02-08-83

<u>Response</u>: Sabotage, vandalism, and malicious damage are a possibility for any powerline. Such an act is, of course, illegal.

Sabotage may not necessarily result in significant disruption of service. BPA's lines are designed so that damage due to a tower failure, regardless of cause, will be limited to the affected structure and possibly to one or two adjacent structures. In the event of such a failure, the towers are repaired or rebuilt and the line restored to service by BPA maintenance crews. Repair could take anywhere from one day to two or three weeks, depending on the seriousness of the damage and how critical it is to restore the line to service.

7. <u>Comment</u>: I have a question. If this powerline goes through this route, the Taft route, my question is, will BPA, which is a Federal agency, be prepared to patrol this transmission route with Federal marshalls to protect it from sabotage?

<u>Response</u>: BPA maintenance crews regularly patrol BPA facilities by helicopter or on the ground. In the event of sabotage, local law enforcement agencies or Federal law enforcement agencies could be utilized to investigate sabotage to the Federal facilities.

8. <u>Comment</u>: What is the procedure when a bridge is not strong enough to support heavy equipment?

<u>Response</u>: If an existing ford crossing is available, or if one can be constructed, this method is used, subject to permission from the owner and with concurrence of State Fishery agencies.

If a ford is not available, it is the construction contractor's responsibility to determine the load limit of bridges and to work with State, County, or private owners to reinforce the bridge. In all cases involving oversize loads, special permits are required and are obtained by the contractor.

9. <u>Comment</u>: I understand talking before that the big problem with the power line through Hot Springs or Thompson Falls is in the Thompson Falls area. Why can't they put . . . all three lines on one tower all the way through?

<u>Response</u>: The suggestion above would require tearing down an existing line (or lines) and rebuilding to double-circuit (or multi-circuit). This would cost quite a bit more than adding a parallel single-circuit line.

BPA would consider this option only in special circumstances, such as where there are terrain limitations, severe impact areas, or land use constraints.

BPA would, in fact, tear down and rebuild in the Hot Springs-to-Thompson Falls area for the above mentioned reasons. For portions of the route between Hot Springs and Thompson Falls, BPA's 230-kV line would be torn down and replaced by 500-kV double-circuit towers with the new 500-kV line on one side and the existing 230-kV line on the other. In certain areas, an additional line would be torn down and added to the double-circuit towers. (See figs. 2.3 and 2.4 in Volume I.)

10. Comment: Can the line be converted to d.c. in any way?

<u>Response</u>: The design could accommodate a direct current (d.c.) circuit with the addition of d.c. insulators. BPA does not currently plan to convert to d.c. in the future. Our present plans provide no additional right-of-way width or tower height, inclusion of d.c. insulation, or other design features for future conversion to d.c. Should the decision ever be made to consider conversion to direct current, environmental studies would be done to determine whether there were any significant impacts associated with such a proposal.

11. <u>Comment</u>: Moreover, we have repeatedly urged revision of the impact statements to adequately treat the issue of reliability of double-circuit construction and the effects of future upgrading of the proposed lines.

<u>Response</u>: Montana Power Company (MPC) is using two separate singlecircuit lines from Broadview to Townsend. BPA has always planned on using double-circuit (both lines on one tower) for the Townsend-Garrison section and the Garrison-Taft (or Plains, or Hot Springs) section. Only one line, a single-circuit 500-kV line, is required from Taft (or Plains, or Hot Springs) to Spokane.

The reason for MPC using two single-circuit lines and BPA using one doublecircuit for both lines is basically a difference in reliability philosophy. That is, BPA feels that one double-circuit is as reliable as two singlecircuits and that there are significantly fewer impacts associated with double-circuit because less right-of-way is required. Cost for double-circuit is also slightly less than for two single-circuits.

The only way the line could be upgraded would be conversion to direct current (d.c.). As discussed in the response to the comment above, this is not currently being planned or designed.

12. <u>Comment</u>: How much road is going to have to be maintained after you're gone?

<u>Response</u>: BPA's experience indicates that about 95% of the roads will be retained for use and 5% will be reclaimed. On joint use roads, BPA shares the road maintenance based on actual use. Roads that are used only by BPA will be maintained by BPA on a regularly scheduled basis, or as the need arises. Generally, roads to each tower will be maintained, but temporary roads, i.e., those used solely for clearing, will be reclaimed and revegetated.

13. <u>Comment:</u> The EIS should include a specific access road plan including tower site locations, road systems, and turnouts. The EIS should also discuss coordination of road standards and access plans with private owners.

<u>Response</u>: A specific access road plan, including tower sites, is possible only after the line is designed. This requires completed surveys which are generally not available until after the EIS process is completed. In fact, detailed line design is usually not started until after the final EIS and subsequent Record of Decision. Garrison-Spokane EIS Wg1815E:02-08-83

BPA does coordinate road location with private landowners. (See <u>Mitigation</u> <u>Measures</u> in Chapter II of Volume I.) Because of the types of equipment required to build a transmission line, BPA's road standards are usually higher than what would be required by private landowners.

14. <u>Comment</u>: The low mileage of "C" [Taft Plan] with "high" road access does not seem reasonable compared to "A" [Hot Springs]. At the Frenchtown meeting, the statement was made that "A" has essentially all roads in place, yet the EIS shows 27.6 miles of "high" road access needs.

<u>Response</u>: We were able to locate Plan C (Taft) to take advantage of many existing roads. After more detailed studies, we found the actual amount of new access needed for Plan C to be less than anticipated in the draft EIS. Plan A (Hot Springs) crosses many areas with few existing roads available to projected tower sites (for example, in the Garnet, Bitterroot, and Coeur d'Alene mountains). Where Plan A parallels existing lines, some additional roads and restructuring of existing roads would be necessary.

15. <u>Comment</u>: How many miles of access roads are required per mile of transmission line?

<u>Response</u>: Miles of new access per mile of line will vary from near zero (where existing lines are paralleled) to as many as five miles depending on terrain, existing roads, and other factors. Typically, from one to three miles of access are required for each mile of transmission line. See access road estimates in table 2.1 of Volume I.

16. <u>Comment</u>: . . . On private land, make access roads as available as possible to the public.

<u>Comment</u>: Also, the roads along these power lines are going to have to be repaired. They are going to allow more hunters onto our lands and I know there are a lot of good hunters out there, but there are a few that shoot cattle mistaking them for elk. We don't want our cattle shot.

<u>Response</u>: The legal access rights acquired on and across private land are for BPA's needs only, and not for public uses. Many of the existing roads will be improved and will provide better access for others. However, the landowner controls who may use these roads. BPA will provide a locking system and put its maintenance padlock on existing or newly installed gates. The landowner can place his or her padlock into this system.

17. <u>Comment</u>: . . . I was being told that they would put the land back into its original shape and they would only use one road. When they left, my land there had roads zig-zagging across all my land over new plowed fields, they had no intentions of putting it back into its original shape, they did not keep their word. . .

<u>Response</u>: BPA's easement agreements with landowners specify that the existing roads used will be maintained and left in the same condition or better when first used. Roads which are not incorporated into BPA's system

will be returned to its original form. In cases where any areas are not returned to their original condition, contact your BPA Area Office, and they will put you in touch with BPA's Chief Inspector. He will make arrangements to correct the problem.

18. <u>Comment</u>: Since permanent access is not required across prime farm land according to the EIS, there is no reason why it should be required to cross other private land. Gates, cattleguards and fences should be established in cooperation with landowners and land users.

<u>Comment</u>: Roads, gates, cattleguards, fences, and all other structures established in connection with the construction of the line must be maintained by BPA. All forms of weed and brush control must be done in cooperation with area landowners and land users and prior approval must be secured from land users on each occasion when these operations are performed.

<u>Response</u>: BPA acquires the rights to use the transmission line right-of-way for access. However due to terrain, land use and other similar factors, legal rights are secured for access roads outside of the transmission line right-of-way to minimize the impact upon the land. Every effort is made to utilize existing roads whenever possible. "Easement Only" rights are required across cultivated lands where road grading is not required or permitted. If grading is required on cultivated lands, the land will be returned to its original shape, including subsoiling to break up any compaction. These routes are selected with the landowner concurrence whenever possible. Gate, cattleguard, and fence locations are coordinated with the landowners. During the construction period, these are the responsibility of the contractor. Weed and brush control is handled by BPA's Area maintenance. (See Part III. C, comment #6, for more detail on weed control.)

# II. L. 2 Cost Concerns

1. <u>Comment</u>: I'm saying that in 1976, they told me they couldn't consolidate because it was going to cost two hundred and forty thousand dollars a mile, but now they are going to consolidate and as a tax payer, I am just sort of interested in how much this line is going to cost the taxpayers, plus the desecration of my property.

<u>Response</u>: Scoping meetings held in 1979 and 1980 revealed much strong sentiment in this area not to take up additional land with the right-of-way, but to try to remove one of the lines now there and consolidate facilities onto one double-circuit set of towers. The slight increment of cleaning up would reduce impacts and would also alleviate many concerns about the width of the right-of-way. Consolidating the lines in this area will cost about \$693,000 per mile. This is \$272,000 more than building a single-circuit 500-kV line would cost.

The line will not cost taxpayers any revenues. The cost of the line is born by users of the power transmitted by the line. In this case, the investor-owned utilities participating in the Colstrip Project and BPA's energy customers bear the cost of the project. 2. <u>Comment</u>: Is it cost effective to fly all the control points prior to an actual corridor selection?

<u>Comment</u>: The Forest Service is currently doing preliminary survey work on the Taft Plan and none of the others. Jack Fisher of the Forest Service stated at the Frenchtown meeting that this was due to the information being needed to properly evaluate that route, and the other areas did not need that because they were sufficiently roaded. That statement does not fit with figures published in the draft.

<u>Response</u>: In order to continue preliminary design for all major alternatives, certain activities must be undertaken. Geodetic control surveys need to be completed before 1984 on all major alternatives. BPA uses photogrammetric and ground survey data to accomplish this work. On Plan C, Taft, due to the heavy timber stands and rugged terrain, ground surveys are needed in 1983 for preliminary design information so that bulk steel quantities can be ordered and clearing and road construction can be scheduled within the bounds of the overall project. Plan B (Plains) and Plan A (Hot Springs) can be surveyed photogrammetrically in areas that are not heavily timbered. The non-parallel portions in heavily timbered areas would be compared to similar terrain on the Taft route, thereby providing sufficient information for preliminary design. In parallel portions, information can be extrapolated from the existing transmission lines' design. If geodetic control surveys were not started now, the project energization deadline might not be met, causing a significant economic loss.

3. <u>Comment</u>: Include cost of, and information from, surveys currently in progress on the Taft route in the Final EIS.

<u>Response</u>: Cost of surveys is already included in the cost estimates for each alternative. Information from surveys currently in progress on the Taft Route, needed for design purposes only, are included in the cost estimates shown in the EIS.

4. <u>Comment:</u> How will this [Garrison-Spokane 500-kV Transmission Project] affect rates?

<u>Response</u>: BPA's transmission construction program aims to provide the best and widest distribution of electric power at the lowest rates possible. The costs of any given project are generally added in with other costs of the Federal Columbia River Transmission System (FCRTS). All users of the FCRTS--including the several companies in Montana, Idaho, and Washington who are Colstrip participants--share in the benefits and the costs of the FCRTS.

Each utility customer pays his or her share of generation, transmission, and distribution costs when paying the electric utility bill. Overall, this single project will not significantly alter rates.

5. <u>Comment</u>: Any chance of having bargain power, seasonal rates when we have a lot of it [surplus power] for us here? Has that ever been thought of?

<u>Response</u>: Bonneville Power already charges less for the power it sells to utilities during the summer months when the water is available than we do in the winter months. That bargain must also be balanced, however, during a dry year when you have very little energy, by a surcharge. Rates are presently figured on the average of these.

6. <u>Comment</u>: How much more expensive is Colstrip power than hydroelectric power?

<u>Response</u>: The costs of the Colstrip plants are estimated to be 23 mills/kWh, without transmission costs or losses. The regional hydroelectric system produces power at an average cost of less than 1 mill/kWh. However, this system has been in place a number of years. Although costs of power from new hydro plants vary widely from site to site, and would be significantly more expensive, it appears that there are several hundred average megawatts of new hydro energy that could be developed at a cost competitive with the costs of the Colstrip plants. However, much of the cost of the Colstrip plants is already incurred, and would not be recoverable whether the plants are actually used to meet the region's loads or not. Land resource forecasts indicate three or four hundred more megawatts of power could be needed in addition to Colstrip at about the time it is scheduled to come on line.

7. <u>Comment</u>: What's the cost of this [transmission line]? . . . How long will that take customers to pay per kilowatt hour? Who's footing the bill?

<u>Response</u>: Table 2.1 in Volume I contains cost estimates for each alternative plan. The costs range from \$225 million for the Hot Springs Plan to \$243.5 million for the Taft Plan. The customers of the utilities sponsoring the Colstrip Project will foot most of the bill because we will, based on the cost of service, charge them for the use of our facilities to get this energy from Colstrip to their load center. Transmission costs are divided over thirty-five years so it would be repaid in thirty-five years.

8. Comment: How were costs figured?

<u>Response</u>: Costs are estimated for substations and transmission lines by considering survey needs, design, material, land procurement, clearing, access roads, construction, and removal of facilities (if required for rebuilding or replacement). Estimated cost of energy losses are also considered in the cost estimates. These are based on line life, cost of energy, and cost of money.

9. Comment: No data on cost of maintaining the line.

<u>Response</u>: Maintenance costs depend upon several factors, including terrain and weather. For any plan, the costs would range from \$250-\$500 per mile per year, and would average \$300 per mile per year.

10. <u>Comment</u>: Cost and impacts of microwave sites and helispots for maintenance are not included in the EIS.

Garrison-Spokane EIS Wg1815E:02-08-83

<u>Response</u>: Requirements for microwave communication to substations under any of the three plans can be met almost entirely with the existing microwave communication system. Cost estimates, which were included in overall project cost estimates, are insignificant (i.e., 0.25 - 0.75 percent) in terms of total project cost.

For Hot Springs, existing facilities can be used although new channels would need to be added. Cost is estimated to be \$30,000. Plains Substation would require two new terminals, one at the substation and one at the existing Locust Hill repeater station, for a cost estimate of \$440,000. The Taft Substation would require a new passive repeater about a mile from the substation site and a terminal at the substation itself. The repeater would be installed and probably maintained by helicopter. Costs are estimated to be about \$490,000. A substation at Eagle Creek to allow the Washington Water Power Company to access the transmission line would require the most new facilities. A new active repeater, along with 1 - 2 miles of road and power would be needed in the Eagle Creek area; a new passive repeater would also be needed, about a mile from the substation. Cost is estimated to be about \$790,000.

Impacts from installation of repeater sites generally involve clearing of 50'  $\times$  50' to 100'  $\times$  100' areas for location of the repeater and possibly a helicopter pad. Additional trees downslope may need to be removed to provide an unobstructed beampath. Road building may also be required. BPA attempts to use existing road systems as much as possible; in this part of the study area there is an extensive network of logging roads that could be used.

The need for helicopters for maintenance will be determined after the line is built. Right-of-way clearing and permanent access roads usually provide suitable locations for landing a helicopter. Any additional requirements for helicopters would be on heavily forested land and would be jointly identified and approved by BPA and the land owner (usually the U.S. Forest Service).

In summary, the need for additional landing areas for helicopters will be minimal, if any, and associated costs and impacts will likewise be minimal.

11. <u>Comment</u>: Under-estimation of costs will be more substantial on Alternative C [Taft Plan] than on Alternative A [Hot Springs Plan].

<u>Response</u>: Cost estimates consider many items including material, clearing, access roads, tower erection, and so on (see response to comment #8). Estimates for alternatives that traverse more difficult terrain, such as the Taft Plan, are increased proportionately to include additional cost for items that may be affected by terrain, accessability, and related factors.

BPA's extensive experience in estimating costs for transmission facilities makes significant under- or over-estimations of costs highly unlikely.

12. Comment: Delaying the line will cost two or three million dollars.

<u>Response</u>: Any delays that affect the scheduled ordering of materials or acquisition of right-of-way easements will result in some increased cost due to a tighter construction schedule. The actual amount, however, is not known at this time.

It should be emphasized that the completion date (energization) has not been delayed. Any delay in energization will probably result in substantially more than two or three million dollars because of the costs of replacement power. It is estimated that delay costs could reach \$19 to \$20 million per month.

13. <u>Comment</u>: A loss savings to BPA and WWP of only \$2 million or about \$60 million over the life (35 years) of the project does not justify spending \$190 million to build the line now.

<u>Response</u>: The \$2 million dollar value for BPA and WWP losses was based on an average value of losses of \$215/mw-yr. This value is now estimated to be closer to \$235 per megawatt year or \$2.2 million. Based on a 35-year life of project, this would amount to \$77 million additional cost to BPA and WWP, assuming no increase in the cost of losses over this period. BPA plans on the "one utility concept." When the loss increases of the Pacific Northwest, Montana Power Company and Idaho Power Company are included. The above values are about \$13.6 million per year or about \$476 million in additional costs to all utilities involved if these facilities were not built for 35 years. This illustrates simply that significant loss savings are realized when compared to the No Action alternative. Construction of these facilities provides an additional 58 MW of power available for consumption with about 66 percent available in Montana.

14. <u>Comment</u>: This [Montana Power Company] is a privately owned utility. Are they going to use the lines here for free or are they going to [pay Bonneville for the rights to receive power over the lines]?

<u>Response</u>: BPA is a Federal agency whose revenues pay the cost of operations. BPA has no profit structure and no excess funds that could be termed a profit. As BPA's costs increase, so do our rates. Because BPA is building part of the transmission line, it will charge private utilities a wheeling charge for using facilities to transport their power. At the same time, BPA will reserve a certain amount of capacity on this line for the Federal government to serve federal needs as they grow.

15. <u>Comment</u>: What percentage of your overall budget do you use for experiments with alternative power sources such as wind power or solar power?

<u>Response</u>: For FY 1983, BPA has budgeted \$288 million for all of its programs and research devoted to conservation, solar, and wind resources. It is not practical to separate the renewable resources budget from the conservation budget because some conservation programs include options for implementing direct-application renewable resources. We do not know in advance how much of the budget for a particular conservation program is likely to be spent on a wind, solar, or geothermal option. The \$288 million being spent on "alternative" resources comprises 12.3 percent of BPA's FY 1983 budget, which is about \$2.4 billion. Garrison-Spokane EIS Wg1815E:02-08-83

The budget figures do not reflect all of BPA's conservation and solar activities. BPA is currently constructing two buildings for its own use that are designed to be highly energy-efficient, and include such features as photovoltaic panels for operating a small generating plant, and technology to capture waste heat generated by computers.

\*16. <u>Comment</u>: In the times of hard times and poor economy of the United States why in the hell is the U.S. Government buying the towers and cable from the Japanese when you preach buy American? Now with so many people out of work are they also going to ship in [illegal immigrants] to do the work at minimum or below wages?

<u>Response</u>: Bonneville Power Administration, as a Federal agency, must follow Federal procurement practices. This requires that the Administration purchase from that responsible contractor who submits the lowest bid. Domestic firms, however, enjoy 6% bid advantage over foreign firms. Additionally, firms operating in a labor surplus area enjoy an additional (total of 12%) 6% advantage over foreign firms.

## II. M. UNDERGROUNDING

Most of the commentors on undergrounding stated that the Garrison-Spokane Transmission Project should be undergrounded to mitigate impacts on a particular resource. While most felt that undergrounding would mitigate visual and health/safety impacts on people, a few others mentioned mitigation of property devaluation and impacts on wildlife, particularly birds.

Most commentors focused on the Miller Creek/Lolo and Rattlesnake Valley areas. Others addressed the possiblility of undergrounding in the Ninemile Valley, Granite County, and around Superior and Thompson Falls. Several stated that the mitigation of impacts justified the cost of undergrounding, particularly when calculated on an annual per-ratepayer basis.

Commentors who referred specifically to the EIS stated that BPA should provide a more detailed comparison of costs and impacts of overhead and underground lines. Some comments stated that, contrary to the EIS, undergrounding is feasible in the Miller Creek and Rattlesnake Valley areas.

Many of these issues are discussed in Volume I, Chapter II and in Appendix E, "Underground Transmission Systems." Other, more specific comments and responses follow.

1. <u>Comment</u>: BPA should provide an explicit comparison of the impacts of overhead vs. underground transmission lines.

<u>Response</u>: A summary of the relative advantages and disadvantages of undergrounding was given in the draft EIS. Appendix E: "Underground Transmission Systems" provides a detailed discussion of the impacts of undergrounding a double-circuit 500-kV line at two locations north and south of Missoula. These locations are representative of the conditions and concerns found throughout the Garrison-Spokane study area. A comprehensive description of underground transmission technology and its implications for the environment in general is contained in the BPA reference document, <u>Underground Cable Systems: Potential Environmental Impacts</u>, published separately from the Draft EIS. This reference document reports on a study of impacts or potential impacts of undergrounding in a broad range of environmental settings and conditions. To compare overhead with underground lines, see table 1 for a synopsis of the above information about the potential impacts of undergrounding near Missoula.

2. <u>Comment</u>: The transmission lines should be placed underground in order to mitigate impacts to people near the lines.

Response: The most commonly expressed concerns are about visual impacts and about possible impacts from electric or electromagnetic phenomena associated with overhead transmission lines. As discussed in the Draft EIS, undergrounding offers advantages in both of these areas. However, there are also disadvantages, also described in the EIS. For example, although visual impacts would be significantly reduced by undergrounding, they are not entirely eliminated, as extra above-ground facilities must also be built to serve the lines. Also, while electric fields from underground cables are zero under normal operation conditions, BPA's overhead lines are designed so that fields are less than 8-9 kV/m, a level at which no adverse effects have been documented. As discussed in the draft EIS and in Appendix E, neither overhead nor underground installations would eliminate the risk of shocks. Regarding possible interference effects, BPA policy is to correct such effects whenever they are caused by overhead lines. There are a number of conventional measures for restoring signal reception. These mitigative measures are considerably less expensive than undergrounding the transmission line.

3. <u>Comment</u>: The cost of putting transmission lines underground is outweighed by the environmental impact associated with putting the lines overhead.

<u>Response</u>: Dollar cost is one of many considerations that go into BPA decisions about putting transmission lines underground or overhead. Tradeoffs between the various considerations must be made by BPA. As explained in the draft EIS, our best judgment after considering the many relevant factors is that undergrounding is still being considered, but that it is not recommended.

4. <u>Comment</u>: The transmission line should be undergrounded at Rattlesnake or Miller Creek in order to avoid adverse impacts on property values.

<u>Response</u>: There is no definitive research available to support the proposition that overhead lines adversely affect adjacent property values (see Part II. J). To date, the research literature is characterized by conflicting results as to possible effects of overhead lines on property values, while nothing at all is known about parallel effects of underground lines. Thus, it is uncertain whether there would be any beneficial effects on property values from undergrounding the lines. 5. <u>Comment</u>: Transmission lines should be undergrounded to mitigate impacts on wildlife such as bird collisions and habitat destruction.

<u>Response</u>: Based on BPA research and experience with other transmission line projects, the potential for waterfowl, raptor, and other bird collisions with overhead lines is not considered a serious problem. In necessary, mitigation can be accomplished by the use of marker balls to increase line visibility, at far less cost than undergrounding. For other wildlife, the major categories of impacts include those caused by clearing trees in wooded areas and by periodic disturbances from personnel and equipment needed to inspect and maintain the lines. These impacts are comparable for both overhead and underground lines, although overhead lines require somewhat more clearing. Clearing has both positive and negative impacts on wildlife in the long-term. (See Part II. K, Wildlife, in this Volume, for more information.)

6. <u>Comment</u>: Contrary to statements in the Draft EIS, undergrounding the lines at the Rattlesnake Creek or Miller Creek/Bitterroot River areas is feasible.

<u>Response</u>: Undergrounding at the Rattlesnake crossing was judged to be undesirable because of extensive deposits of unstable materials that occur along the right-of-way. These unstable deposits would pose hazards to personnel and equipment or otherwise complicate construction of an underground line. During operation of the cable, land displacement in unstable areas could damage the cable and cause electrical failure. Undergrounding at the Miller Creek/Bitterroot River crossing was also inadvisable for geotechnical reasons. Dynamic floodplain deposits would have to be crossed in lower Miller Creek. The Bitterroot flooaplain poses particular problems of erosion and scouring that would increase the design, construction, and maintenance costs of the line or result in complete relocation. These factors are explained more fully in Appendix E to the draft EIS.

7. Comment: The reliability of underground cable systems is not a problem.

Response: Underground cable systems have been used in urban areas for almost a century. Many systems at low transmission level voltages have operated well beyond their design life. However, every cable system is custom designed, limiting the ability of the utility industry to predict performance for even a single cable type and voltage rating. As pointed out in the draft EIS, underground cable designed for 500-kV service is a recent development and very little has been installed in the United States or elsewhere. Prototype cables have undergone considerable testing, but no consistent sample of cable installation exists to evelop a statistic. As a result, the long-term reliability of 500-kV cable must be considered an unknown.

8. <u>Comment</u>: The cost analysis for underground lines presented in Appendix E is inadequate because it is too general. A more detailed analysis of the cost of undergrounding at Rattlesnake and Miller Creeks should be conducted, and its results included in the Draft EIS.

# TABLE 1

# UNDERGROUND AND OVERHEAD TRANSMISSION SYSTEMS: COMPARISON OF POTENTIAL SOURCES OF IMPACIS

| Construction: Short-<br>Term Impacts               | Undergrouna Systems   | Overhead Systems   |
|--|---|--|
| General  | Impacts continuous along the right-of-way<br>(ROW)  | Impacts are concentrated at tower sites<br>Shorter construction times  |
| Land Use   | Disruption of existing land use   | Disruption of existing land use  |
| Ecology  | Disturbance or destruction of local habitat<br>(including clearing)<br>Trenching & Hauling (dust and siltation)<br>More machinery and worker activity         | Disturbance or destruction of local habitat<br>(including clearing)<br>Digging tower foundations (at intervals)  |
| Esthetics  | Clearing a narrow ROW (where wooded)  | Clearing generally wide ROW (where wooded)   |
| Sound  | Noise from construction equipment<br>extensive excavation   | Noise from construction equipment<br>localized excavation  |
| Operation & Maintenance:<br>Long-Term or Recurring |   |  |
| Esthetics  | Visibility of terminal stations<br>Visibility of narrow cleared ROW<br>(in wooded area west of Route 12/93.)  | Visibility of towers and lines (long-range)<br>Visibility of wide cleared ROW<br>(through wooded area west of Route 12/93.)                              |
| Ecology  | Local magnetic fields*<br>Heat dissipation*<br>Small oil leaks* (dielectric fluid)  | Electric and magnetic fields along<br>the ROW interference or inductive<br>coupling possibly requiring mitigation*<br>Interference with birds in flight* |
| Sound  | Routine inspection/maintenance of ROW<br>and station equipment<br>Long repair times (including locating damage)<br>Repair activities could involve excavation | Corona noise along the line (during wet<br>weather)<br>Routine inspection/maintenance of ROW<br>Rapid, comparatively less complicated repairs            |

\*Potential effects that are unlikely or have minimal impact.

<u>Response</u>: Estimates cited in Appendix E are \$21.6 million at the Rattlesnake Valley and \$37.1 million at the Bitterroot River near Lolo. Although these are general estimates based on preliminary electrical, structural and geotechnical specifications, they do provide adequate information for comparing the overhead and underground options.

The United States General Accounting Office (GAO) performed an independent evaluation of the cost of undergrounding at the request of Senator Baucus of Montana. The conclusions of the GAO, as reported to the Senator on May 7, 1982, were in agreement with the BPA cost estimates. The GAO will provide copies of its study to interested parties.

9. <u>Comment</u>: The cost of undergrounding the lines at Rattlesnake or Miller Creek is not prohibitive, particularly on an annualized per rate payer basis.

<u>Response</u>: BPA has judged that the cost of undergrounding the lines at Rattlesnake or Miller Creek is excessive whether considered as a lump sum, or on an annualized or per-ratepayer basis. One of BPA's responsibilities is to provide reliable power to all its customers at the least cost compatible with other considerations, such as environmental impacts. In accord with this responsibility, BPA has judged that the cost of undergrounding at these locations must be used by the decisionmakers in arriving at a final designation of the plan and a decision on the necessary mitigation.

## II. N. MITIGATION

Comments on mitigation were received on most resource topics and geographic areas and are responded to under these categories (in Parts III and IV of this Comment/Response Volume) Many resource-specific comments suggested use of mitigation techniques that are standard BPA measures. Many emphasized the need to be sure that BPA follow through on the proposed measures. Those most commonly suggested had to do with reducing visual effects and effects on soils/erosion/sedimentation. Undergrounding and use of helicopter construction were also mentioned, although these are not now included in the recommended proposal.

Comments on mitigation and responses not discussed under individual resource areas are presented below.

1. <u>Comment</u>: The preferred alternative (Taft plan) would result in less sedimentation than the other alternatives even though it crosses more steeply sloping land. This would be true apparently because this routing crosses fewer areas of "problem" soils. We do not dispute BPA's analysis of potential sedimentation of the various alternatives, but would point out that the above would probably be true only if stringent erosion control, including project follow-up, is carried out by the BPA and its contractors.

The quality fisheries and presence of numerous municipal watersheds make strict erosion control most important to this project. We endorse all erosion control described in the DEIS and believe these measures should be made part Garrison-Spokane EIS Wg1815E:02-08-83

of all construction contracts. We also recommend all contract work be closely monitored and, if necessary, stopped or altered if excessive erosion is resulting.

Response: Mitigation measures for erosion control as stated in the EIS will be made part of the construction specifications (refer to <u>Mitigation</u> <u>Measures</u>, in Chapter II of Volume I). Construction, as recommended above, will be limited during periods of adverse soils conditions to avoid erosion and associated soil impacts.

BPA is currently conducting research in cooperation with the University of Washington and Washington State University to develop additional vegetation management techniques for use in watersheds or near other sensitive areas such as high value fishery streams. Every effort will be made to minimize impacts on soils and/or water quality by using existing access roads and working with appropriate agencies on stream crossings.

2. <u>Comment</u>: BPA should use more expensive mitigation techniques, as do other agencies, to protect the environment.

Response: BPA does, in fact, implement mitigation measures which increase the cost of the line. Examples include: extensive use of dulled towers, conductors, and spacers to minimize visual impacts; location of the line away from populated valleys and in more rugged terrain, where feasible, to minimize impacts and land use conflicts with urban areas, residential areas, and agricultural land; and possible selection of a more expensive alternative (Taft Plan) to minimize overall environmental impact.

3. <u>Comment</u>: I would estimate that a complete screening of the towers, planting of low growing evergreens, conifers and native shrubs under the lines would add approximately one tenth of one percent to the cost of construction. Has that been considered, or is there a technical reason why it can't?

<u>Response</u>: BPA does make an attempt to screen towers as much as possible. However, towers averaging 175 feet in height would be impossible to screen completely.

Native vegetation is left as much as possible in the right-of-way. Only trees which would grow within minimum conductor clearances within or adjacent to the right-of-way are removed. Where rights-of-way cross major highways, rivers and visually sensitive areas, a screen of natural vegetation is left. BPA plants vegetation in sensitive areas, as necessary, to screen the line. At this time, we are unable to estimate total costs for vegetative screening.

4. <u>Comment</u>: Now, should the line have to go through the Missoula area, the Taft route would be the best location, but the Maxville Town site, the Miller Creek Crossing, Ninemile Crossing, St. Regis vicinity and the Washington Water Power Line Connections need better mitigation to reflect or to take care of the quality of the human environment. . . . Such things as the Ninemile Crossing, helicopter installation and no roads on lower slopes. Miller Creek the lines could be shifted to the south. I think they would be hidden better. . . Burial is not out.

<u>Response</u>: As discussed in the EIS, extensive mitigation measures are being prescribed for such sensitive areas. Conductors will be dulled to reduce reflective qualities. Tower darkening will blend towers with background. Clearing will be reduced as much as possible in areas with high visual impact by extending spans where possible, by taking advantage of terrain with steep slopes, by raising tower heights, and by selective cutting. Improved appearance structures could be used in areas of high visual impact with foreground views. Access roads (which would be necessary to service each tower even if helicopter erection is used) will be located and designed with mitigation measures to reduce visual impact. The centerline will be adjusted as much as possible, considering engineering and cost factors, to reduce environmental impacts while taking landowner requests and conments from concerned groups and individuals into account. Factors related to undergrounding are discussed in Part II. M.

5. <u>Comment</u>: The text does not adequately consider the use of longer line spans and helicopter construction to reduce proposed standards for access roads. These mitigating measures need to be fully evaluated on private resource lands along with those areas addressed in the text. Avoid access roads by installation of pads and towers by helicopters, and that is possible. The contract can state that this has to be done by helicopter. You have that option, it's more expensive, but the people who live in the area have to live with the line.

<u>Comment</u>: Helicopter erection should be used in areas where extensive roading would be damaging.

<u>Response</u>: The spans between towers will be as long as possible but are limited by terrain. The optimum span is 1150 feet which could be increased if the line crosses an area with very steep slopes that permit longer spans. Span lengths are determined in a large degree by topography.

BPA allows the contractor to use either cranes or helicopters for tower body erection. Helicopter construction, however, could be undertaken only with light sections of the towers. Footings and leg extensions would be installed with smaller cranes requiring ground access to each tower. Heavy structures could only be erected by conventional cranes. Access is required to each tower site for maintenance and for some phases of construction such as footing work, conductor work, and tower clean-up. Helicopter erection does not significantly change the impacts under these circumstances. In no case would BPA allow a series of towers to be without ground access.

6. <u>Comment</u>: Location, construction, and maintenance methods should be least detrimental to land users and owners.

<u>Response</u>: The location and environmental study process is designed to minimize impacts on landowners. In addition, numerous mitigation measures have been incorporated into the proposal for this purpose. BPA works closely with landowners in location of the line, towers, and access roads to minimize impacts on landowners during construction and maintenance. 7. <u>Comment</u>: DEIS page II-11: BPA should work with landowners and land managers to develop appropriate mitigation measures for affected timberlands.

Response: BPA would work with landowners and land managers to develop ways to reduce effects of the line, right-of-way, and access roads on timberlands.

8. <u>Comment</u>: Here too, in regard to the visual impact, the DEIS is inconsistent. In one place (p. IV-36) it suggests that the impact could be lessened by avoiding access roads and using non-reflective materials. But it is clear, as said before, that heavy roading would occur and marking of lines; and the DEIS itself admits (on p. IV-30) that there is only one effective mitigation measure: "avoiding crossing near or close to intensive use areas would constitute the best mitigation."

<u>Response</u>: Avoiding intensive use areas admittedly would be preferable. However, this may not be possible. Impacts can normally be reduced by limiting access roads and using non-reflective material. If extensive roading is required, mitigation becomes less effective. Marking of lines is normally done for aircraft warning and is required by FAA regulations.

9. <u>Comment</u>: The techniques of minimization of visual impact suggested by BPA are not sufficient. [BPA's] response to this was to tell us what they are. [Given as a reason not to develop new and better measures]

<u>Response</u>: Mitigation measures suggested by BPA are effective in reducing impacts. We are also continuing to investigate new and better techniques that include the possible use of improved appearance structures in certain areas.

10. <u>Comment</u>: Two visual analysis reports "St Regis, February 1982," and "A Visual Assessment for the Lolo National Forest, April 1982" have been submitted to BPA. The April 1982 report contained selected points on the Lolo and the Idaho Panhandle National Forests. The conclusions of these reports should be incorporated in the proposed mitigation in the FEIS. It should be noted that these reports do not represent a complete visual analysis for national forest system land, and are applicable only to the areas identified in the reports.

<u>Response</u>: BPA cooperated with the Forest Service on these reports and have found them to be useful. Many of their conclusions have been incorporated into the mitigation section of the final EIS.

11. <u>Comment</u>: On p. IV-31 [61], paragraph 4, section "Aesthetics," the impact on Segment 145 is stated as "The line would cut across the grain of the land, would be out of scale with its surroundings and would be ever-present in the view. Greatest impact would be upon travelers on I-90 and local residents. The transmission line would disrupt the visual integrity of this highly scenic portion of the Clark Fork Valley." The BPA has acknowledged the highly significant aesthetic effect in this area, yet in the mitigation section no mention is made of segment 145. <u>Response</u>: Mitigation for segment 145 is covered in Chapter II of Volume I, which covers mitigation common to all plans. Specific mitigation for this segment include the use of non-speculor conductors, treated towers, limited clearing and access road construction.

# **Resource Concerns**

## III. RESOURCE CONCERNS

#### III. A. URBAN/RESIDENTIAL

Most commentors on this subject stated that the transmission line should be sited off private land, out of valley bottoms, and away from populated areas. Some also stated that the line should avoid residences by at least one-half mile. Others stated that the line would restrain future growth and eliminate the possibility of lands with development potential from ever supporting desirable residential or commercial developments. One commentor questioned the intensity of urban impacts in a primarily rural region. And finally, a few people felt that the EIS should explicitly state whether any families would be displaced by the project and note relocation procedures if so.

Many of these concerns are addressed in the EIS, Chapters II and IV of Volume I. Site-specific comments are treated in Part IV, GEOGRAPHIC AREAS OF CONCERN, in this Volume (II). Other specific comments and responses follow.

1. <u>Comment</u>: Site the line to avoid residential and inhabited areas. Keep the line off private land, out of valley bottoms and away from populated areas. The line must avoid residences by at least one half mile.

Response: Avoiding people and inhabited areas has been a prime criterion of the route location process (see table 2.3, in Chapter I of Volume I). However, it is virtually impossible to locate a transmission line no closer than one mile or even one-half mile from any residence. Physical constraints, such as terrain; engineering factors, such as snow and ice loading; and need for access to the right-of-way, are but a few factors which come into play in locating a transmission line. Building a line between Garrison and Spokane necessitates crossing numerous river valleys, most of which have concentrations of private land and are dotted with settled areas. The possibility of future reinforcement of a populated area (i.e., Missoula), also requires a location reasonably close to the load center. Because it is impossible to stay out of all valleys, off all private land, and away from all residences or developed land by an absolute distance, the study team located routes which would have the least possible effects on people while balancing the other location criteria. The alternative routes studied reflect this approach. See also Part II. I for discussion of public versus private land for siting.

2. <u>Comment</u>: The power line will restrain future growth, affect future residents and eliminate the possibility of lands with excellent development potential from ever supporting desirable residential or commercial developments.

Response: All three routes were located as much as possible to avoid land proposed for development. However, they all cross some areas that have been subdivided, but not yet developed: Hot Springs (7.7. miles crossed); Plains (3.1 miles crossed); Taft (3.6 miles crossed). Not all of this land is Garrison-Spokane EIS Wg0041H:02-07-83

intended for residential or commercial development; it is difficult to tell exactly what portion is. Depending upon the size and intended future use of the particular parcel crossed and on location of the right-of-way on the parcel, the powerline could conflict with its development. Generally, those lands with the best potential for residential or commercial land are avoided in the location process. Similar existing lines have not been obstacles to residential development, as subdivisions are commonly built up to right-of-way edges. The 125-foot-wide right-of-way does not restrict development of a significant amount of land. The visual presence of the facilities, while admittedly unattractive to some people, does not discourage others from locating residences nearby.

3. <u>Comment:</u> Now I am developing my property [Rathdrum area]. We have to change our roads on our development plan because of the line.

Response: Any location through the Rathdrum Prairie will be on existing BPA easements. Originally, a 425-foot wide easement was obtained; only the BPA Bell-Noxon 230-kV line occupies the right-of-way at this time, leaving approximately 300 feet available for additional lines.

Towers for the Garrison-Spokane 500-kV will be placed, in most cases, adjacent to the existing steel towers on the Bell-Noxon line.

4. <u>Comment</u>: I wasn't aware that this part of the country was primarily urban, so, of course, the impact is minimal, because we're rural communities here.

Response: Most of the study area is rural in nature. However, some areas are more densely settled or developed than others, though perhaps most are not as dense as cities. The urban-residential analysis took these "built-up" or developed communities into account and sought, where possible, to avoid them. Overall, the project would have limited effect on such areas. The Taft plan would affect the fewest developed or developing areas.

5. <u>Comment</u>: The final EIS should state whether or not any families will be displaced as a result of this project. If any relocations will be required, the relocation procedures that will be followed should be discussed.

Response: As stated on page IV-3 of the DEIS, no existing buildings or dwellings (and therefore, no families) along any of the alternate routes would be displaced. This statement is carried forward in the final EIS.

6. <u>Comment</u>: The Taft plan passes within a half mile of fewer houses than does the Hot Springs plan. This statement is misleading because it does not address how many people bought and built homes already within a half mile of an existing major power line. It would be better to identify how many homes not presently impacted would be in the future with each alternative.

<u>Response</u>: The same types of impacts on developed land would occur along either new or parallel portions of the route. Both areas would experience short-term inconvenience effects from noise, dust, and traffic to a similar degree. The transmission facilities would cause visual impact in either area as well. It is true that most of the Taft route would be new corridor and that, for residences here, this would be a first-time impact. However, a parallel line on portions of the Hot Springs route would incrementally increase the visual effects of the existing line and right-of-way.

Factors which relate to visual impacts along parallel portions of the Hot Springs route include the fact that: (1) the new facilities would be double-circuit 175-foot-high steel towers added alongside existing and much shorter 125-foot-high single-circuit 500-kV towers, 90-foot-high single-circuit 230-kV towers, or 70-foot high single circuit wood poles; and (2) a greater number of residences is located closer to the parallel routes in areas where less visual screening is available from either trees or landforms. Also, the potential for land use conflict is greater along the Hot Springs alternative than along the Taft route. Although neither route directly conflicts with existing developed land use, the Hot Springs Plan (A) would cross more land that has been subdivided but not yet developed (7.3 vs 3.6 miles). Potential conflicts would therefore be greater here. Since the existing line crosses areas where development has occurred or has been planned, it is difficult to avoid conflicts with such uses when paralleling, whereas it may be more feasible to do so when locating a new route.

7. <u>Comment</u>: BPA tried to imply that they counted residences when they identified a community, but actually did not. . . A community can apparently be any number of residences or any number of residences can be counted individually. What constitutes a community is determined by BPA.analysis on a case-by-case basis.

<u>Comment</u>: Communities were not counted until after the corridor and route selections were made.

Response: Residences were not counted in identifying communities. Rather, communities were identified during the data collection phase of the study by interpreting the relative density of development using categories set down in the data item definitions. These categories were based on the US Geological Survey Land Use/Land Cover system, which is the primary such system in use in the country. Settled areas or communities were termed either "urbanresidential" areas or "dispersed development" areas, depending upon how densely settled they were (see fig. 4.3 in the draft EIS).

Absolute numbers of residences and communities along each route were not totaled until the analysis progressed to a comparison of Plans A, B and C. At this stage, numbers of individual residences and communities were considered in the segment-by-segment impact analysis.

8. <u>Comment</u>: No distinction [was] made between Missoula, Maxville or the smaller communities. All received a rating of one, as if there were no difference in population, characteristics, etc. The methodology is designed to be manipulated in such a way that human population impact can appear to be whatever the BPA analysts choose regardless of actual population.

<u>Response</u>: All other factors being the same, the magnitude of the effect would be greater on a community than on a single residence and more on a large community than a small one. However, factors vary in significance. Consequently, the evaluation of effects on human population was done by characterizing problem areas individually and predicting actual impacts as accurately as possible, considering the many interrelated factors. Numerical measurements--whether of communities, single residences, or land uses--were only a part of this process.

## III. B. FORESTRY

Concern that impacts on forest lands and productivity were underestimated was expressed. Commentors were particularly concerned over the long-term economic loss, visual impacts, and loss of productive forest lands along the Taft route. Some were confused over metric measurements of forest productivity. Commentors requested coordination of access road locations, clearing, and timber disposal with forest managers and landowners. They were also concerned that landowners' options to grow forest products compatible with right-of-way management not be foreclosed.

Related economic concerns are also covered in Part II. J and III. I. General and specific impacts on forestry are discussed in Chapter IV of Volume I. Additional concerns are addressed below.

1. <u>Comment</u>: Several individuals expressed the concern that the impact of right-of-way and access road clearing on timbered lands was underestimated and/or understated in terms of long-term economic loss, visual impacts, and loss of productive forest lands, especially as it relates to the Taft routing.

<u>Response</u>: In timbered land, the maximum clearing for the right-of-way would be approximately 15 acres per mile or land. Additional cleared area would be needed for access roads located outside the right-of-way, and would approximate 3 to 8 acres per mile of road, depending on topography. In order to minimize the "tunnel" effect common to older corridors, the clearing edges along the right-of-way will be irregular and feathered, reducing the amount of necessary clearing. Clearing will be the widest at tower sites and generally at midspan between towers, where the conductor comes closest to the ground on flat topographic grades. Little or no clearing will occur where the line crosses draws and where there is adequate safety clearance. The clearing for the right-of-way and roads will be long-term and will be maintained for the life of the transmission line. However, low-growing Christmas trees or shrubs may be allowed under agreement between the landowners and EPA. A description of clearing needs is found on page II-6 in the draft EIS and is carried forward in the final EIS.

Short-term economic benefits will result from the sale of commercial products and the resulting labor required to clear and mill the products. Long-term economic losses will occur due to the restriction against growing saw-timber-sized trees in the cleared areas. The discounted value (1978 dollars) of this future crop loss is not large, and would have the least effect in the Hot Spring alternative. The Federal money that is returned to the counties as a result of National Forest revenues will not be affected by this project. Each county's portion is based on the total National Forest receipts and is prorated to the counties by the National Forest acreage within each county, not by the receipts received from Forest land within each county. This project will not have any effect on the total National Forest receipts that would otherwise be realized, since ownership of the land does not change and since the right-of-way has no significant impact on the timber base of the National Forests.

The major trade-offs associated with reducing the impacts on timbered lands include higher impacts on agricultural land (located in other places) and placing the transmission line closer to ranches, residents, or undeveloped subdivided lands, all of which are in private ownership.

2. <u>Comment</u>: Map Volume, Appendix C, Hot Springs-Bell study area, Land Productivity: Forest, underestimates productivity class ratings from Evaro to Arlee. Much of the land is Douglas Fir/Vaca, Grand Fir/Clun, or Grand Fir/Libo habitat types. Thinning investments have been made or are being made along most of the proposed right-of-way. Also, thinning investments have been made along most of the proposed right-of-way from Hot Springs to Dog (Rainbow) Lake. The use of cubic meters per hectare as a measurement of productivity, as opposed to cubic feet per acre, is inconvenient, as most productivity is still measured by cubic feet per acre. Please see Appendix A, "Methodology."

<u>Response</u>: The data show that most of the forestland between Evaro and Arlee, Montana, is in the moderate (50-85 cubic feet per acre per year) and high (85+ cubic feet per acre per year) productivity classes (see fig. 4.4), which is in agreement with the habitat types cited above. Most of this forestland, along with almost four miles of forestland between Hot Springs and Rainbow Lake, has been identified as being under intensive management.

The cubic feet per acre productivity measurement has been added to Appendix A, Methodology, Attachment 2, pages 11 and 12 (see ERRATA, Chapter IX in Volume I).

3. <u>Comment</u>: The EIS does not seem to recognize that a power line across timberland has a much greater adverse impact on production than a line across farmland. In timberland on steep slopes, production on adjacent land may also be affected.

<u>Response</u>: When assessing the relative impacts of a transmission line on timber and agricultural land, it is important to consider a wide range of short-term and long-term factors. Some of these factors lend themselves to quantification in dollar terms and some do not. For instance, both types of impacts include inconvenience and production effects that spread to areas outside of the right-of-way.

It is also important to recognize that, in terms of impacts on people, forestry and agricultural production losses may differ in their effects. Loss in forest production is most likely to affect only a small portion of timberlands owned by a few large corporations. However, losses in agricultual productivity and inconvenience effects are more likely to affect individual farmers whose holdings are smaller and whose operations may also be important parts of their overall life style.

4. <u>Comment</u>: People expressed concern that access road locations, clearing, and timber disposal be coordinated with operations of the landowners or managers. A concern was also expressed that landowner options to grow forest products compatible with right-of-way management not be foreclosed.

<u>Response</u>: Under the mitigation measures presented on page II-ll of the DEIS, it is stated that BPA will work with landowners and managers to minimize impacts from clearing and access road needs. When new road construction is required, its location will be coordinated with the landowners' needs. Agreements can be made with landowners to allow low-growing Christmas trees, shrubs, and so on to be grown. These agreements also identify responsibilities for vegetative management and are very site-specific.

5. <u>Comment</u>: Concern that the presence of the lines would impede forest fire suppression.

<u>Response</u>: Concerns about safety in firefighting operations in the vicinity of power transmission lines are well founded. Forest Service policy to place safety first in all activities is well established in the <u>Health and Safety Code</u> and <u>Fireline</u> Handbooks. The proposed transmission line will preclude the use of certain fire suppression methods within the immediate vicinity of the line; however, the existence of the lines should not prevent firefighters from taking effective action on any wildland fires. Firefighters are given additional training to ensure safe operations in the vicinity of transmission lines. On occasion some fires may increase in size due to restrictions in use of aerial attack and water, but there are effective alternate control methods that could be used. As a result, the Forest Service does not anticipate that any fire will escape control as a specific result of restrictions on methods of fire attack.

The proposed transmission lines should not be vulnerable to wildland fires. The tower heights and materials are such that only the most extreme fire behavior would cause any potential for line failure.

6. <u>Comment</u>: Concern for the presence of the lines impeding forest fire suppression in the Rattlesnake National Recreation Area.

Response: After further study, the interdisciplinary team has elected to drop from the preferred route the alternative that would have passed through the Rattlesnake National Recreation Area (see Part IV. L for more detailed discussion). Thus, the problems of fire suppression in this area would not be increased by the project.

7. <u>Comment</u>: The impact of line location on forested lands needs to be expanded to include the restrictions imposed on slash disposal and big game winter range burning to avoid flash-overs. An estimate made in one ranger district indicates that in excess of 700 acres of winter range treatment may be foregone due to the location of the transmission line. The mitigation to relieve this situation would be very expensive slash removal in timber harvest areas; curtailing electric transmission while burning near the line; and, in the case of winter range, the substitution of hand labor and use of herbicides in lieu of burning.

<u>Response</u>: Further coordinated interagency study is needed to prescribe appropriate site-specific mitigation on forested lands also managed for big game winter range. No general prescriptions for burning exist. Areas of important habitat along the right-of-way would have to be analyzed individually and prescriptions for burning or other slash disposal and vegetation management methods would have to be individually worked out. See Chapter II, Volume I, for mitigation related to vegetation management and wildlife habitat.

#### III. C. ACRICULTURE

Commentors on agriculture expressed concern for the removal of agricultural land from production. Not constructing the line across agricultural lands in order to minimize agricultural impacts was a primary concern. The draft EIS estimates of agricultural land and productive capacity lost were also questioned. Other major concerns involved the inconvenience to farming operations, particularly irrigation activities, imposed by the presence of transmisson lines. Some commentors expressed concern about the spread of weeds along the right-of-way. Inaccuracies of DEIS maps showing agricultural lands were also noted.

In addition, several other commentors made observations on agricultural land or practices in the study region. For instance, one comment noted that "Under the northern route, grazing and farming would keep the right-of-way clear, naturally."

General and specific discussions of agricultural impacts are found in Chapter IV of Volume I. Other comments are addressed below.

1. <u>Comment</u>: BPA should avoid agricultural lands, so that land is not taken out of production, farming practices are not impeded, and irrigation systems are not made impracticable.

Response: Avoiding agricultural lands was a primary concern throughout the environmental analysis process, with particular emphasis placed on trying not to remove land from production, trying to minimize inconveniences for farming practices, and trying to avoid irrigated lands. All classes of agricultural lands were included in the study, with irrigated farmlands being considered as most seriously affected if crossed by a powerline. Those lands classified by the SCS as "prime farm land" or "farm land of statewide importance" were also considered to be susceptible to serious direct impacts because these lands are mostly well suited to future irrigation development, if they are not already irrigated. However, the concern to avoid farmland had to be balanced with other resource topics and public concerns in determining a least-impact route (also see Parts II. C and II. G. 3). For instance, a number of commentors favored paralleling existing corridors, yet it is these existing routes which cross the most farm and range land. Although all routes have been located to reduce conflicts with agricultural land, the Taft Route (environmentally preferred) encounters the least--only 1.7 miles of farm land in the Garrison-to-Taft section and 24.0 miles in the Taft-to-Bell section. Most of the latter occurs in the Spokane area, where the line would be located on an unused right-of-way parallel to an existing BPA line. The total rangeland encountered by the Taft Route is 14.1 miles, compared to 18.9 miles on the Plains Route and 62.8 miles on the Hot Springs Route.

Where agricultural land must be crossed by the line, measures to reduce actual impact become very important (see <u>Mitigation Measures</u> in Chapter II of Volume I). In particular, BPA consults with the landowner to determine feasible tower locations which will minimize problems and inconveniences to the producer and which will remove as little land as possible from production. The loss of productive land is normally limited to that directly beneath and immediately surrounding each tower, and farming and ranching operations can continue along the right-of-way.

With regard to agricultural land that is removed from production for access roads, BPA would offer the landowner two options. We will either leave the access road in or remove it and compensate landowners for crop damage when their lands must be crossed for operations and maintenance procedures.

Where towers must be placed in cultivated fields, a variety of techniques are used to minimize the impacts on soils, to avoid or minimize conflicts with irrigation systems, and to reduce the inconvenience associated with continued farming in the right-of-way.

Where feasible, lines crossing circular irrigation systems may be designed and towers located so that the conductors will span the fields. Other mitigation measures might include: 1) shortening the radius of a circular system to allow passage at the tower; 2) substituting a different kind of irrigation system which would be more compatible; 3) installing equipment to reverse the 2ystem automatically as it approaches a tower; or 4) realigning systems so they can freely pass between towers. These measures have been specified in the EIS and a compensated for.

2. Comment: Farmland is valuable and should not be taken out of production.

Response: Avoidance of valuable farmland was one of the important criteria for the siting of this project. (See response to previous comment.)

Land occupied by the tower (approximately 0.14 acre per mile) and that immediately adjacent to it will normally not be usable for farming purposes. In most cases, farming along the right-of-way can continue. As stated in the draft EIS (p. II-ll), through consultation with the producer, towers can often be sited for minimal disturbance, such as along the edge of fields, on rocky knolls or on other poorly producing spots, or adjusted so that the entire field is spanned by the conductors.

According to results of a study conducted by a Washington State University area agronomist, yields of wheat, corn, sugar beets, and potatoes may be reduced by 10-20% in an area approximately 0.1 acre in size around each tower base (Kornelis, 1977). No yield reduction occurred in the remainder of the right-of-way. The yield reduction near towers, combined with the area lost directly beneath towers, would amount to maximum production losses equivalent to that from 0.14 acres plus 0.1 acres, 1/ or 0.24 acres per mile of line. Only under rare circumstances would the amount of land removed from production decrease the economic viability of a farming/ranching unit to the extent that it would be necessary to convert the unit to other uses.

3. <u>Comment:</u> . . . The report . . . also understates the impact on agricultural land removed from production. . . people . . . will, I'm sure, take exception with the acreages that are quoted. It is not clear if the values quoted are the acreage per tower or total acreage for each segment of the line. In either event, to assume that the amount of land stated in the report is all that will be adversely affected is a serious error. Perhaps if one measures the actual square footage of the footings of the tower, it is apparent--it is probably in agreement with the report. However, the total area impacted would be a lot greater because of the potential hazard to machinery, livestock, as well as the unwillingness of persons to work close to or under the towers themselves, regardless of the true effects on people.

<u>Response</u>: As stated in the EIS, agricultural land occupied by tower bases would be removed from production. The amount removed would be between 0.05 and 0.3 acres per mile of transmission line. Figures presented in the discussions on agriculture in Chapter IV give land lost from production along each route. The draft EIS recognized that, in addition to the land removed from production, the line would also have adverse effects on agricultural operations or nearby acreage. For a complete discussion of these inconvenience effects, please see Appendix D, "Social and Economic Considerations," page 3-12; also see Chapter IV of Volume I for general impacts. However, because these inconvenience effects do not lend themselves to quantification, they were noted but not presented in monetary amounts in the EIS.

4. <u>Comment</u>: The agricultural impact level that they have noted for the Hot Springs to the Thompson Falls, is on the order of one hundred and eighty thousand dollars lost crop value during construction. I would argue as a primary agricultural provider in the county that that figure is very, very low. They also said that the annual loss and productive capacity for the entire length of the line would be four thousand eight hundred and sixty-three dollars. I think that's absurd. . . it would be significantly higher.

<sup>1/</sup> 0.1 acres per tower x 5 towers per mile = 0.5 acres per mile. 0.5 acres per mile x 20% reduction in crop yield = 0.1 acres per mile.

<u>Response</u>: When interpreting the figures for agricultural impacts on page IV-9 in Appendix D, it is important also to consider the assumptions presented on page II-14. As these assumptions state, "productive capacity lost" refers only to land in the right-of-way during construction and land near towers during the operations period of the line. Other potential economic effects on agriculture, such as interference with worker or irrigation practices, would vary on a site-specific basis. They are difficult to estimate and have not been incorporated into the analysis summarized on page IV-9. These types of effects could increase the line's adverse economic effects on agriculture, but are not quantified in the analysis of lost productive capacity. (See response above.) With respect to the existing corridor between Hot Springs and Thompson Falls, along portions of this corridor an existing line would be removed and a new one built in its place, resulting basically in only the short-term disturbance and inconvenience.

5. <u>Comment</u>: Can farmers have some assurance that towers will be placed to minimize disturbance to farming practice?

<u>Response</u>: As indicated in the response to comment #1, in agricultural areas it is BPA policy to locate towers to minimize impacts to farming and irrigation. This includes working with landowners to locate towers to minimize disruption of existing or planned operations.

6. <u>Comment</u>: A third area of professional concern is . . . weed highways. Disturbed sites along powerline rights-of-way are commonly invaded by noxious weeds which spread along the route. These weeds use the disturbed right-of-way to enter crop land, rangeland and forests. Costs of weed control programs are thereby increased and generally result in increased herbicide use along the route.

Response: After construction, BPA fertilizes and reseeds disturbed sites. Reseeding is done with seed mixtures recommended by the local county agricultural agent in the area, the SCS, or the appropriate land management agency. These measures nelp to prevent weed infestations. Some weeds appear to be invading on their own, independently of any construction activities (i.e., Knapweed, Leafy Spurge). BPA recognizes, however, that noxious weed infestation can occur at disturbed sites along transmission line rights-of-way. Where BPA's actions have caused and/or contributed to the problem of noxious weed infestation, and where active weed control programs are being conducted by landowners and weed control districts, it is BPA policy to cooperate with landowners and weed control districts in controlling noxious weeds.

Cooperation with the affected landowners or Weed Control District can include several types of assistance by BPA. First, BPA often accepts responsibility for weed control on private land in the right-of-way. In these cases, BPA, with the landowner, determines what weed control action is necessary. Then BPA or a weed control contractor employed by BPA will spray the affected parcel. Second, in other cases where local Weed Control Districts prefer to maintain responsibility for control of noxious weeds spread in a corridor, BPA will pay the district to carry out appropriate actions. Finally, when the landowner wants to maintain responsibility for controlling weeds on his own land, BPA supplies the landowner with the appropriate chemical spray.

It should be noted that, on the Garrison-Spokane Project, the small amount of agricultural land crossed will prevent widespread changes in weed control practices from occurring.

7. <u>Comment</u>: The map for irrigated farm land acreages between Maxville and Drummond was not correct.

<u>Response</u>: The colors for irrigated and dryland fields were inadvertently reversed during printing of the Agricultural Land Maps (Appendix C - Map Volume) in the draft EIS. The map has been reprinted with the final EIS. The environmental analysis for agricultural lands was conducted prior to this stage and from maps at a larger scale, and was not affected by this error.

#### III. D. RECREATION

Commentors on recreation generally were concerned that the transmission line would interfere with or decrease the quality of recreational activities. These concerns center on the visual intrusion and recreational use restrictions posed by transmission lines. Concerns about impacts on scenic rivers, designated National Recreation Areas, and recreation sites receiving assistance from the Land and Water Conservation Fund (L&WCF) were voiced. Commentors expressed interest in mitigation designed to minimize impacts to existing and potential recreational resources. Additionally, some stated that portions of the DEIS do not properly reflect levels of recreational use.

General and specific discussions on this subject appear in Chapter IV of Volume I. Other concerns are addressed below.

1. <u>Comment</u>: Several concerns were expressed about how the transmission line would destroy natural beauty, would interfere with recreational activities, would decrease the quality of recreation, and would adversely affect sightseeing.

<u>Response</u>: The siting of the line took recreation impacts into consideration. However, not all recreation impacts can be avoided in transmission line location due to the widespread dispersed recreational use of the study area. For the proposed Taft route, siting the line on benches and slopes out of valley bottoms, off private land and away from communities as much as possible helps to hide the line from view and places it in areas used the least by people. Recreation impact would remain higher for those who recreate in or near the right-of-way area than for travelers; these people would need to seek out other areas if a primarily wilderness or undisturbed experience were most important. Exposure of the line will be held to the minimum, considering all location factors.

As discussed in Volume I, Chapter II, mitigation is being incorporated into the design of the project to reduce impacts on natural beauty, recreational

activities, and sightseeing. Measures will include coordination with the landowners and managers to minimize clearing and road needs; the use of non-reflective conductors; and the darkening of towers in sensitive areas. Other measures may be identified and incorporated into the construction specifications when the final location of the line is determined.

2. <u>Comment</u>: The opportunity for outdoor recreation activity is substantial in the [study] area, with a variety of activities available. As stated on page IV-5, mitigation measures can reduce impacts. A mitigation plan designed to minimize impacts upon affected existing and potential recreation resources should be included as part of the project.

<u>Comment</u>: The proposed routes shown in figure 4.1 indicate that the transmission line will have varying degrees of impact on a number of areas which have received assistance from the Land and Water Conservation Fund (L&WCF)... in some cases, the impact will be only visual, but it appears that certain of these areas lie directly on the proposed routes of the transmission line. We recommend that every effort be made to avoid crossing these areas and, wherever possible, to minimize or avoid visual impacts.

<u>Response</u>: As stated in the draft EIS, mitigation to reduce the visual impacts on recreation sites includes taking advantage of topographic and vegetative screening, tower darkening where needed, and the use of non-reflective conductors. The detailed mitigation plan will be developed during ground location and typically includes centerline adjustments to avoid or reduce impacts on recreation sites.

Recreation sites can be avoided in the final location of the transmission line. There are no recreation sites or access points that have received Land and Water Conservation Fund Act assistance that will be directly affected, or visually affected to the point that a change in land use will be necessary.

3. <u>Comment</u>: The Blackfoot River, crossed by segment 113, has also been designated (as well as [being] on Nationwide Rivers Inventory) as a special conservation corridor due to its outstanding natural and recreational qualities. We strongly recommend that the project sponsor avoid the Blackfoot River corridor in order to prevent visual intrusion on these qualities. We also recommend that the project sponsor contact Missoula County in order to coordinate plans for the final route of the line. Missoula County has administrative responsibility for the Blackfoot River Conservation Corridor. If the selected route crosses the North Fork of the Cœur d'Alene (on Nationwide Rivers Inventory) or the Blackfoot River, mitigation measures should be taken in order to minimize or avoid visual intrusion upon these river areas.

Response: As discussed in the draft EIS, BPA, in consultation with the Heritage Conservation and Recreation Service (now consolidated with the National Park Services), submitted a Wild and Scenic River Assessment on December 17, 1980, which discussed potential impacts on and mitigation measures for the Blackfoot and North Fork of the Coeur d'Alene River.

Mitigation measures would be incorporated and implemented in a joint BPA -Forest Service project plan for the North Fork of the Coeur d'Alene River and with Missoula County for the Blackfoot River. Measures, under consideration as discussed in the DEIS, p. II-ll to 21, include: (1) crossing rivers at right angles instead of paralleling for any length; (2) spanning at the highest reasonable elevation to reduce or eliminate clearing of trees in the river canyon; (3) use of non-specular conductors (wire that has low reflective characteristics); (4) painting towers to blend with the natural setting; (5) retaining existing vegetative screening; and (5) minimizing new access and disturbance in the vicinity of the crossings.

Impacts from a power line across either river could be significant if they were classified as recreational rivers at the places where the line would cross. Based on this assessment, the line is not expected to affect the recreational values for which the rivers were inventoried, although it will create a localized visual impact.

4. <u>Comment</u>: The description of the Tart plan in Chapter II is lacking. It is stated that less people along the route use the area for recreation, yet there is no proof. Rock Creek and the Coeur D'Alene River are mentioned as far as recreation, but there are many other areas such as Miller Creek, Blue Mountain, Ninemile, and Deep Creek, to name only a few.

<u>Comment:</u> Recreation counts should be taken to see which area is used the most.

Response: The environmental analysis recognized that several recreational areas of local and regional significance could be affected by the various alternative segments. Only the two recreational areas of national recognition are named on page II-19 in the draft EIS. A more detailed discussion of impacts and the areas affected is contained in Chapter IV. Recreation use counts along alternative routes have not been made, but use by area (e.g., Forest Service Ranger District), is known. Some smaller areas such as Blue Mountain and Rattlesnake Creek do have use estimates but this is generally not true for individual recreational complexes throughout the study area. The use figures available allowed the study team to make relative comparisons of areas on a broad scale, but could not be used to measure the impact of a specific segment on recreation use; dispersed recreation use inventories do not exist for all areas crossed by specific routes.

5. <u>Comment</u>: The recreation corridor impact map does not properly reflect the impacts on dispersed recreation on the Deerlodge National Forest. The map should reflect moderate to low impacts along most of the corridor instead of no impact.

<u>Response</u>: There is an error in the draft EIS, in figure 4.5, Recreational/Cultural Features, in that the color for recreational areas (green) was left off in the printing of the Garrison-Missoula portion of the study area. This mapping detail is provided in Appendix C, DEIS, on the Recreation: Areal Resources map.

Only the areas of intensive recreational use (developed and undeveloped) are mapped. A reasonable way to display widely dispersed recreation uses such as hunting, berry picking, or cross-country travel has not been developed. The Recreation Corridor Impact Map incorrectly labeled the vast majority of the study area as having no impact on recreation. This is in error, as most of the area supports a low level of dispersed use, but it is not teasible to map this use. The "None" in the legend has been deleted, but the map will continue to depict only the mappable recreation use impacts.

6. <u>Comment</u>: Transmission lines and associated access roads would adversely affect animal populations that are important to local residents from both recreational and economic perspectives. In addition, out-ot-state hunters might avoid the area in the future because of the line's adverse visual effects.

<u>Response</u>: Interviews with local outfitters revealed strong concerns that, as a result of the transmission line, animal populations (and particularly elk) would leave the area or decrease in number. These changes could in turn shift the economic benefits of out-of-state hunters' expenditures to other towns or counties or otherwise cause them to decrease.

Local outfitters indicated that some of their clients would be affected by the visual presence of a transmission line and some would not. The most sensitive clients would be those who desire "primitive" hunting experiences and those who stay at lodges or guest ranches which could be located close to the line. The extent to which any of these clients would forego trips to Montana because of the visual presence of the line is not known.

It is important to note that although the socio-economic assessment did not explicitly try to account for differences in potential economic impacts on outfitters as part of its route-ranking process, the affected animal populations were considered in great depth as part of the <u>Wildlife</u> considerations (see Chapter IV in Volume I).

## III. E. AIR QUALITY

Commentors on air quality impacts focused on concerns that slash burning and ozone production would deteriorate air quality. Some requested further substantiation of the DEIS contention that transmission systems discharge barely perceptible ozone amounts and suggested that net ozone emission increases be quantified and that supporting literature and modeling techniques be specified.

One commentor noted a concern that the presence of the line may indirectly affect the air quality of a small valley adversely by forcing a planned subdivision to relocate into the valley floor. (See part IV. I, Lolo/Miller Creek/Blue Mountain.)

Further information on Air Quality effects is contained in Chapter IV of Volume I, under Introduction of Topics and Consultation, Review, and Permit Requirements.

## III. F. WATER RESOURCES

Concerns for water resources focused on the impacts of increased runoff, erosion, and stream sedimentation associated with transmission line construction. Of primary concern were impacts affecting municipal watersheds and high value fishery streams. Other commentors focused on objections to tower placement on floodplains, herbicide pollution of streams, depletion of summer moisture, and impacts on fish hatchery operations. Some commentors questioned the accuracy of the DEIS water resources impact data. Failure to recognize some streams as perennial and to identify particular sloughs and springs was also noted.

General and site-specific impacts on water resources are discussed in the EIS, Chapter IV. Other comments are discussed below.

1. <u>Comment</u>: And under forestry, the removal of one hundered forty miles of forestland trees has to affect the rate of snow melt during the spring season in this area. The too rapid runoff will cause flooding and a depletion of summer moisture.

Response: As the comment indicates, the snow melt rates tend to be higher in relatively open rights-of-way than in adjacent forest land, resulting in intensified erosion and increased sediment yields deposited in streams in comparison to off-right-of-way areas.

On the average, the amount of land cleared for a right-of-way amounts to only a fractional percent of the total area of a drainage. Also, the routes are generally aligned perpendicular to streams, rather than parallel to them for any distance. For these reasons, a 125-foot clearing aligned at right angles will not allow rapid enough runoff from snowmelt to cause spring flooding or depletion of summer moisture in areas along the Garrison-Spokane transmission line. Short-term impacts would occur from temporary increases in turbidity and sedimentation levels, but no serious long-term impacts are predicted.

2. <u>Comment</u>: . . .The [Taft] corridor will impact three municipal watersheds. The springs above Alberton, Flat Creek above Superior and Packer Creek above Saltese will be crossed. These sensitive drainage basins have restrictions on timber harvesting and other activities in order to protect the quality of water on which these three communities depend.

<u>Response</u>: The three municipal watersheds mentioned (Alberton, Superior and Saltese) are all sensitive drainage basins and will need mitigation measures to protect the water quality. BPA will work with the necessary local government agencies to minimize impacts from clearing and access road systems (refer to Chapter II, <u>Mitigation Measures</u>). Implementation of these measures and precautions will limit impacts to short-term increases in turbidity (similar to that experienced after periods of heavy rain).

3. <u>Comment</u>: The DEIS indicates that water quality could be affected primarily through an increase in sedimentation as a result of erosion from cleared areas and traffic movement through stream channels. It also indicates

that water quality may be affected by herbicide runoff into some streams. The DEIS, however, does not address the possible impacts to fishery resources which may occur as a result of these changes in water quality. The DEIS should include some assessment of what these impacts may be and the relative magnitude of them under the various alternatives. In particular, it should address impacts which may occur where the proposed line would intercept watersheds containing high value fishery resources, such as Rock Creek.

<u>Response</u>: As stated in the draft EIS on page IV-8, most water resource impacts are short-term and of low significance. Transmission lines do not usually parallel streams, but cross them at an angle. Therefore, the stream length exposed to disturbance is kept to a minimum. Vegetation along streambanks is left intact for a minimum width of 100 feet.

Also streams are forded by vehicles only where bridges are unavailable. These and additional standard measures (as discussed in Chapter II) greatly restrict the amount and timing of sediment introduced into stream systems and minimize changes in the streamside environment as well. As stated in the EIS, BPA continues to work with Federal, State and private concerns to implement measures which will reduce fishery impacts. As indicated in Volume I, herbicides will not be applied aerially for this project. Hand spraying and cutting would be confined to selected areas. Due to this limited application and the fact that herbicides used by BPA are highly resistant to leaching, very little if any herbicide residue should reach stream systems. For the above reasons, changes in water quality would be minimal along any alternative and are not expected to affect fishery resources. As stated in Volume I (Mitigation Measures) and Part IV. H, no new access road construction clearing will occur and no towers will be located on the Rock Creek valley bottom. Impacts from sedimentation would probably not occur.

4. <u>Comment</u>: There is no mention of the (Hale) fish hatchery and the fact that the power line and road system associated with it might cause severe damage to the water source for the fish hatchery (segment 26).

Response: The Hale Fish Hatchery, located along the South Fork of the Coeur d'Alene River east of Mullan, was not specifically mentioned in the draft EIS because no noteworthy impacts were anticipated. The proposed route in this area (segment 26) parallels the river for approximately two miles. However, the line would be located along the upper slopes far enough away from the river (a distance of 1/4 - 1 mile) so that construction activities would have little effect. Sedimentation would be primarily short-term, during construction. Mitigation measures (see comment above) will reduce sedimentation and consequent reduction in water quality in the fish hatchery area. These measures also include using low gradient road cuts, limiting construction during periods of adverse ground conditions, and seeding quick-growing grass species at disturbed sites. Drainage structures and other standard measures (see <u>Mitigation Measures</u>, Chapter II), will also be used to prevent rapid runoff and minimize siltation. 5. <u>Comment</u>: The "Hydrology Corridor Impact Map," (Appendix C) where the Taft alternative would cross the Clark Fork River is categorized as having no impacts; we would like to see the specific information which supports this claim.

<u>Response</u>: The map information on streams and rivers was inadvertently omitted from the "low" impact overlay when printing the hydrology corridor impact map for the Garrison-Missoula study area. Also, the category "none" should not have been included in the map legend. A corrected map will be printed with the FEIS.

6. <u>Comment</u>: Map volume, Appendix C, Hot Springs-Bell study area, Hydrology: Surface Water fails to identify Finley Creek and its several tributaries as perennial streams. It also fails to identify the north and east forks of Valley Creek as perennial streams. Additionally, there are sloughs and springs immediately east of Dog (Rainbow) Lake at the head of Cottonwood Creek which are not identified.

Map volume, Appendix C, Hot Springs-Bell study area, Hydrology: Special Features, fails to list the Jocko River, Finley Creek and Lower Valley Creek as high value fishery streams.

Response: Perennial streams shown on this map were taken directly from the USGS Topographic 502 series (1:250,000 scale) used as a study area base map for the project. This generalized information was used for study-area-wide regional analysis and corridor identification. Assessment of impacts along the routes was performed using the larger scale USGS topographic maps, 7-1/2- and 15-minute quadrangles, which show the perennial stream network in finer detail.

Montana Stream Evaluation Maps, dated 1979, were used for the analysis of the western portion of the study area. At that time, these maps had not been completed for the Flathead Indian Reservation. Updated stream evaluation maps (dated 1980-81), which include the high value fishery streams mentioned in the above comment, were used for the eastern portion of the study area. The analysis and appropriate maps are being revised for the final EIS to reflect this updated information.

# III. G. SOILS/GEOLOGY

Commentors expressed concern that transmission line construction would seriously increase erosion, mass movement activity, and stream sedimentation. Some commentors questioned the ability to revegetate denuded sites and whether BPA would employ stringent erosion controls. Concern was also expressed over the potential impacts of the proposed routing along geologic faults. In addition, commentors questioned the reliability of the soils/geology data presented in the DEIS.

General and specific discussions of soils impacts are presented in Chapter IV of Volume I. Site-specific concerns are addressed in part IV, GEOGRAPHIC AREAS OF CONCERN, of this Volume. Other comments and responses follow below.

1. <u>Comment</u>: Concerns for erosion and other soils impacts were expressed (especially along the Taft route).

<u>Response</u>: As discussed in the draft EIS, the construction and maintenance of electrical transmission facilities can affect earth resources in many ways. Most impacts occur either during or immediately following construction. At this time, vegetative cover is at its minimum and increased erosion often results. Effectively mitigated, erosional impacts are short-term, decreasing in intensity as mitigation efforts take effect. Long-term impacts can result from changes in runoff characteristics created by the presence of access roads or landscape alterations. However, proper road design and construction practices can minimize adverse impacts.

To reduce the potential impacts of erosion, BPA routinely: (1) selects routes, whenever possible, to avoid highly erodible soils and slide-prone slopes; (2) restricts heavy construction machinery use when it is necessary to cross steep or unstable areas; (3) leaves ground cover, brush, and small trees for soil stabilization whenever possible; (4) reestablishes vegetative cover on erosive areas disturbed by construction as quickly as possible; (5) designs and constructs access roads to include erosion control measures and maintains roads after construction; and (6) limits construction during times of adverse soil conditions. These standard measures are discussed in Volume I, Chapter II.

As stated in the DEIS (p.II-19), the Taft plan was selected as the preferred alternative from an earth resources standpoint since it largely avoids soils that are highly erodible, unstable, or possess physical characteristics restrictive to construction and maintenance activities. However, because it crosses relatively steeper terrain, stringent road design, erosion controls, and construction practices will be employed and monitored to minimize adverse impacts.

2. <u>Comment</u>: Concern was expressed for hazards involved with locating a route along the Osburn Fault.

<u>Response</u>: The Osburn Fault, one of the major faults of the Northern Rocky Mountains (Campbell, 1960, and King, et al., 1970), does not pose a major threat to the proposed transmission line. Although the Osburn Fault has been active recurrently during its geologic history (Freidline, et al, 1976, and King, et al, 1970), more recently it has been relatively inactive as demonstrated by the lack of displacement among later geologic deposits (Campbell, 1960, Umpleby, 1924). Seismic activity is not a major siting constraint in this area. Towers and substations are designed to meet nationally accepted industry stanoards. Towers are already designed to withstand wind-induced vibration, while substations are designed to accommodate ground movement. In addition, the proposed Tatt route parallels the fault, thereby minimizing any hazard to the line from potential displacement along the fault, should it become active. 3. <u>Comment</u>: The BPA's draft environmental impact statement classifies soils in this specific area [Rimrock Road, Chilco Lake, Rathdrum Prairie] as having low erosion susceptibility as well as low potential for mass movement. However, in "Soil Survey of Kootenai County Area, Idaho," a 1981 soil conservation service publication, these specific areas are classified as steep slopes, moderate water permeability, very rapid runoff, and very high erosion hazard potential. Personal experience of landowners in the North Rimrock agrees with the SCS geological evaluation. Recent development projects have compounded an already acute runoff erosion situation wherein the local road system must essentially be rebuilt annually, turbidity in area streams and ponds has increased markedly, and siltation and sedimentation has caused increasingly diminished reservoir capacity. The Rimrock Property Owners' Association strongly feels that the proposed power line construction project would overburden the existing soils problem in this area. It is for this reason that we urge your further study and selection of another right-of-way location in an area of less potential environmental degradation.

Response: The draft EIS geology maps of erosion susceptibility and mass movement potential were compiled from U.S. Forest Service maps of land suitability for electrical transmission lines. These maps are general in nature and therefore give only an approximate representation of potential impacts. It should be emphasized that the geologic maps contained within the DEIS were neither the only nor the dominant source of information used for route comparisons.

There is more detailed information on Chilco Lake area soils that are vulnerable to impacts imposed by construction and maintenance activities (see USDA-SCS, 1981). BPA selects routes, whenever possible, to avoid highly erodible, unstable, or otherwise sensitive soils. However, in the Chilco Lake area, analysis factors other than earth resources favored location of the line along the proposed route. In this case, it is important that careful road design, very stringent erosion controls, and proper construction practices are employed. Project follow-up will include monitoring and immediate mitigation of any erosion or earth resources impacts caused by construction or maintenance activities.

## III. H. CULTURAL RESOURCES

Commentors on cultural resources were concerned about possible omissions from the DEIS of significant historical and cultural sites. One commentor suggested that the State Historical Preservation Officers' correspondence be included in the Final EIS.

Chapter IV of Volume I contains information on general and specific impacts on cultural resources. Additional comments and responses follow.

1. Comment: Opposition to the Taft route was expressed because, among other effects, the Taft route would alter cultural resources.

<u>Response</u>: Impacts on cultural resources would occur from any of the alternatives. However, based on the analysis, it was determined that Plan C (Taft) would threaten fewer significant cultural resources with serious impacts than would the other routes. The reader may wish to compare the specific descriptions of impacts on cultural resources, found in the section discussions in Chapter IV: ENVIRONMENTAL CONSEQUENCES, of Volume I. (Also see Choquette and Holstine, "An Archaeological and Historical Overview of the BPA's Proposed Garrison-Spokane Transmission Line Corridor," Eastern Washington University Reports in Archaeology and History 100-20, Cheney, Washington, 1982.)

2. <u>Comment</u>: Concern was expressed about omissions in the DEIS of Indian burials near Weeksville, at the mouth of Weeksville Creek, and near the Plains golf course; Indian campsites near the proposed substation near Plains; and Chinese construction workers' camps at Weeksville.

<u>Response</u>: Information for the draft EIS was obtained from the Montana Statewide Cultural Resource Inventory at the University of Montana and from a literature review. The above mentioned resources have not been recorded in the Statewide Inventory and were not identified in an overview-level review of published regional literature. It is always assumed that cultural resources not formally recorded in inventories and/or published literature will be identified and properly mitigated during intensive survey of the route's centerline corridor. The information above has been added to the project data base.

3. <u>Comment</u>: Copies of the State Historical Preservation Officer's (SHPO's) correspondence should be included in the Final EIS to provide supporting documentation pursuant to 36CFR800.

<u>Comment</u>: We are pleased to note the statement on page IV-16 regarding compliance with the National Historic Preservation Act of 1966, and all other laws and regulations protecting historic and archaeologic resources. Plans include developing mitigation or avoidance measures with help from the Advisory Council on Historic Preservation and from appropriate State Historic Preservation Offices (SHPO) (page IV-16).

The plans outlined on page IV-80 state that prior to construction, a survey of the selected route and substation site will be conducted by a qualified archeologist/historian to determine whether any previously known historic or archeologic sites are present and to determine the extent of known sites. It also stated that the National Register of Historic places eligibility determination request will be made in consultation with each SHPO (Washington, Idaho and Montana).

Copies of the SHPO's correspondence should be included in the final environmental statement to provide supporting documentation pursuant to 36 CFR 800.

<u>Response</u>: BPA will comply with Section 106 of the National Historic Preservation Act by allowing the Advisory Council on Historic Preservation to comment on its undertaking through the Council's regulations (36 CFR Part 800). This process characteristically involves consultation among the Advisory Council, BPA and responsible State Historic Preservation Officers (SHPO's) to decide on methods to avoid, reduce, or mitigate adverse effects construction may have on historic and archaeological properties. Since the cultural resource intensive survey (on the ground inspection of the project area) which assesses the probable magnitude and significance of cultural resources identified within the project area will not be completed before this EIS is published, only those consultation documents available at time of publication can be included.

# III. I. SOCIAL AND ECONOMIC CONCERNS

Many of the commentors on social and economic issues cited opposition of a particular community, group of residents, or individual residents to placement of the transmission line near their homes. Commentors opposed siting the lines nearby for a variety of reasons, which included perceptions of property devaluation, adverse esthetic effects, lack of need for the project, and construction-period interference with local activities. Many groups and individuals stated that people had established their homes in rural areas and opposed the siting of a transmission line near them because it would detract from the rural environments that are important to their overall quality of life.

The commentors addressed other topics as well. A few expressed concern about social effects that construction workers would have on local communities. Others highlighted the use of eminent domain as a social impact and noted that access roads could adversely affect local residents' recreation patterns by opening up secluded areas. Still others stated that using routes along existing corridors was better than opening up new corridors because residents there had already learned to accept the presence of a transmission line.

A number of commentors addressed a wide variety of economic issues. Several expressed concern about the projects' potential to open up mining operations to increased trespassing, theft, and vandalism. Others asked about blasting and other mining operations around transmission lines. Many stated that no forest land should be removed from production and that a transmission line would interfere with timber harvesting and management operations in their areas. Others reflected concern for farmers and ranchers located adjacent to but not under the easement and for the line's possible effects on reputations of purebred cattle and horse operations. (Many of these issues are also dealt with under the respective separate resource topic headings elsewhere in part III.)

Several comments addressed visual effects of the line as an impact on recreation or economic development. The commentors on recreation noted that much of the local economy depends on scenic quality and that a transmission line would reduce the area's attractiveness to tourists, vacationers, hunters, fishermen, and other recreationists. Other commentors stated that visual impacts from the line could impair local communities' ability to attract new industries, investors, and other economic development.

Other commentors asked about the amount of local labor that would be used on the project.

A few commentors dealt specifically with the socioeconomic components of the EIS. Some felt the discussion gave more attention to construction workers' positive impacts than to long-term visual, economic, and health effects. Others objected to the social "alienation" ratings given to specific route segments, while still others suggested alternative routings to reduce social impacts.

Socioeconomic impacts, both general and specific, are discussed in Volume I of the final EIS and in Appendix D. Comments about socioeconomic impacts on particular places are discussed in Part IV, GEOGRAPHIC PLACES OF CONCERN, of this Volume. Some comments on socioeconomics are found under the heading of Process/Methodology (part II. G. 2). Other comments and responses follow.

1. <u>Comment</u>: Among many others, the communities of Maxville, Missoula, Gold Creek, Lolo, and Drummond are opposed to the Garrison-Spokane Transmission Project being constructed near their towns and residences. Reasons for opposition include, but are not limited to: property devaluation, adverse esthetic effects, lack of need for the project and traffic and construction activity. Many of these communities are very united in their opposition to the project. Some of the residents have lived in other areas where transmission lines were installed and witnessed adverse effects there.

<u>Response</u>: During scoping for the project, much concern was noted to avoid placing the transmission line near towns and residences. Reasons offered were similar to those expressed in the comment. In response to the public's concerns, routing criteria were developed to avoid residential and inhabited areas as much as was practicable (Chapters I and II of Volume I). No homes or dwellings will need to be removed as a result of transmission routing. However, because of land use, topographic, or engineering constraints, it is not possible to avoid proximity to all residences and communities. Out of necessity, the line must pass near some communities between Garrison, Montana and Spokane, Washington. (Also see discussions in Parts II. C and II. G. 2.) Where the line is near residences, BPA works to mitigate the changes in environment that may be induced by the project.

2. <u>Comment:</u> Many residents in Western Montana have settled in or established seasonal residences in rural areas where they can be isolated from other people and commercial and government institutions. In making the decision to live in these rural areas, many of these people have chosen to live without urban amenities and to restrict or eliminate their use of electricity. Their enjoyment of life in these rural areas is derived primarily from the natural environment and from the area's wilderness qualities. As a consequence, these rural residents are particularly sensitive to the intrusion of a transmission line that would have adverse visual effects on their homes and property. Many of them also resent having to live near a transmission line whose purpose is to transmit energy to the urban facilities and services they have chosen to do without in their own lives. To summarize, most of these people prefer not to have a transmission line installed near them because they feel it would detract from the rural environment that is very important to their quality of life.

Response: These types of concerns have been voiced by many individuals in newspaper articles, in field interviews, and in the scoping meetings held throughout Western Montana, Idaho, and Washington. In general, these individuals have shown environmental awareness and a widespread desire to see local communities and rural areas maintain their small town atmospheres and scenic qualities. Many of them have remained in the area despite occasional economic downturns in the resource-based economy, and others have moved to the area more recently, specifically to enjoy its scenic beauty, attractive climate, and variety of outdoor recreational opportunities.

The Garrison-Spokane Transmission Project will undoubtedly affect many individuals in the ways expected in the above comment. However, it must be noted that both the route identification and route selection process used by BPA and the interdisciplinary team attempted to avoid rural residences and landowners wherever possible. Although the least-impact routes minimize contact with rural individuals, they still near some residences, a fact reflected in the social component discussion of the EIS. The project would be developed so as to minimize that intrusion (see <u>Mitigation Measures</u>, Chapter II of the EIS).

3. <u>Comment</u>: Local residents who feel that they will be forced to accept the line are very concerned about its potential social and environmental impacts. In many cases they feel that adverse commercial and aesthetic effects would make large numbers of people unhappy, particularly those who have worked or lived on their land for long periods of time.

<u>Response</u>: The construction of a project to which there is heartfelt opposition can cause its opponents to become distressed, frustrated, and alienated. Although the site selection process attempted to minimize the potential for these types of effects by avoiding residences and private landowners, these effects still occur in those areas that could not be avoided for technical reasons or where the natural environment would be severely affected.

4. <u>Comment</u>: The only pat answer was that "the present route has the least environmental impact." I say "bull." It does have an impact on those people who have to live here. This is our environment. We will be picking up the tab for these huge towers and lines.

<u>Response</u>: Although the Taft Route would have important impacts on those people who have to live near it, it would affect fewer people overall than either the Plains or Hot Springs Route. The conclusions of comparative evaluations are documented in Chapter II of Volume I. (See also the discussion under Part II. G. 3.)

5. <u>Comment</u>: Impacts to the counties are all negative in both financial and social respects.

<u>Response</u>: The line's local social impacts would overall be negative. Many of the impacts that could have occurred have been alleviated through the site selection process, however. Others may be alleviated through social

mitigation measures (see <u>Mitigation Measures</u>, in Chapter II, and Appendix D). Although the project will cause some adverse economic impacts, several of these could be mitigated through impact aid payments. The project's employment and income impacts are considered positive to local governments (also see Part II. K in this volume).

6. <u>Comment</u>: The route through the existing corridor that traverses the Rattlesnake Valley is unacceptable because a 500-kV line would cause disruption for the residences during construction.

<u>Response</u>: Concern about the construction period's impacts on residences has been expressed by many home- and landowners throughout the study area. In general, homeowners' concerns are focused on the disagreeable esthetic aspects of the construction process, such as noise, dust, road damage, loss of privacy, and the difficulty of accepting the line's existence. These possible environmental consequences are described under <u>Urban-Residential</u> in Volume I. These adverse effects will be minimized to the extent possible by careful construction practices and close supervision of the construction process by BPA. Also see Part IV. M (<u>North Missoula</u>) where these impacts are discussed in greater detail.

7. <u>Comment</u>: But remember, these people and this state deserve just as much [as city-dwelling government employees] when they wish to retire or pass the privilege of living in this area to the next generation. We don't want it to come over any of our land, but if it must, please be considerate enough to evaluate sincerely as if you were going to be the owner of that piece of property over which this proposed energy source has to pass.

<u>Response</u>: Many residents have expressed the importance of passing the land they have cared for along to future generations in its current unspoiled condition. As stated in the EIS, where the line must cross private land, BPA will consult landowners on final centerline location and work with them to mitigate adverse impacts.

8. <u>Comment</u>: Why isn't there any mention of the county and people living here despite the fact there are these people and these people might live on the Taft Route area? The BPA might, at least, see social impact imposed. It is easy to say, if you work for BPA, ignore the quality of life, ignore the type and quality of recreation, ignore the hundreds and thousands of vacationers that travel I-90, and weigh only in a few communities and the number they reach.

<u>Response</u>: Although the social impact assessment process focused primarily on impacts that would be felt by rural and community residents, it also identified a wide range of impacts that could be experienced by vacationers and recreationists who use public roads and lands. The social impacts experienced by vacationers and recreationists have been described under <u>Esthetics and Recreation</u> in Chapter IV of Volume I. Also see Parts III. J and III. D of this volume. 9. <u>Comment</u>: Concern was expressed for social impacts of the influx of construction workers, especially in Mineral County, and also for unemployment and lack of local workers employed.

Response: As described in the EIS and in more detail in Transmission Line Construction Worker Profile and Community/Corridor Resident Impact Survey: Final Report (Mountain West Research, 1981), very few adverse impacts can be anticipated from the presence of transmission line construction workers. In general, residents of communities near transmission line construction projects in the Pacific Northwest regarded transmission line workers as reasonably decent, well-behaved, friendly people whose expenditures benefited the local communities.

Western Montana is currently experiencing severe unemployment conditions, particularly in the timber industry, where skills are highly suited for right-of-way clearing. Despite the availability of these skills, local employment by the right-of-way clearing process would depend on the hiring practices of the clearing subcontractor. The skills needed for line construction are less available in the local area and local employment for this process would also depend on the contractor's hiring processes.

10. <u>Comment</u>: It [use of eminent domain] is involved in that it is a social impact that has not been dealt with in the EIS, and this is something that should be dealt with, it is the resentment of the people. It was dealt with in the other EIS's.

Response: In the final EIS, the use of eminent domain as a social impact is discussed under Social and Economic Considerations in Chapter IV. Local residents whose land will be crossed by the line would be likely to suffer some anxiety about their participation in a negotiation process. These feelings could be complicated by the possibility of condemnation and by the belief that their private property rights are being ignored. (For additional discussion also see Parts II. J and II. K of this Volume.)

11. <u>Comment</u>: The roads necessary for the tower location and maintenance would destroy the surrounding landscape [near Maxville] and create access into areas nearby which are currently delightfully secluded.

<u>Response</u>: These concerns are shared by residents throughout the study area. Many private landowners expect that new access roads would increase the potential for trespass, littering, and property damage. Recreationists have stated that they would be particularly sensitive to the presence of access roads in forest settings. Other concerns regarding access roads on both private and public land include the opening of natural environments to increased vehicular use and hunting, and increased potential for environmental damage due to erosion. These concerns were considered in formulating the methods for the socioeconomic (and natural environment) assessment (see Volume I and Appendix D), and are reflected in the study conclusions.

12. <u>Comment</u>: I prefer the existing Northern route [which would parallel the Anaconda-Hot Springs-Noxon-Bell line north and west of Missoula] because, among other reasons . . . the power lines are accepted by the residents.

<u>Response</u>: Based on information collected during interviews with local residents, the socioeconomic analysis considered it preferable in most cases to site a line along existing corridors. However, it cannot be stated that existing power lines have been accepted by residents or implied that an additional power line would not make a difference to local residences. For instance, residents along the twin 230-kV corridor south of Drummond and in the Plains-Thompson Falls corridor feel that an additional line in their areas would have disastrous effects. As stated in the response to comment #1 under II. C., <u>Corridor Development/Future Planning</u>, the route preferences are determined by balancing all environmental factors. In some cases, paralleling an existing corridor best reflects this balance. In others, creating a new corridor does.

13. <u>Comment</u>: Mining claims will be more accessible to the public as a result of the construction of access roads. Miners will encounter problems with trespass, theft and vandalism. This will create the need for additional police protection, investigation and criminal litigation. The work load of the Mineral County Sheriff's Department will increase all along the corridor due to an influx of workers. After the line is completed, law enforcement expenditures will remain high in order to police the corridor zone.

<u>Response</u>: Mining claims may become more accessible to the public as a result of new access roads. But because existing road systems are used as much as possible, the new access is often dead end spur access. The extent to which this increased accessibility will place additional burdens on local law enforcement agencies would depend on their current demands and capacities and on whether the public actually causes mining operations any problems. Increased costs for law enforcement associated with development of the project can be compensated by impact aid payments. (Impact Aid is also discussed under part II.K.) In the Wallace-Kellogg mining area of Idaho, interviews with miners that had operations in heavily roaded areas did not reveal any conflict between miners and the public.

As described in <u>Transmission Line Construction Worker Profile and</u> <u>Community/Corridor Resident Impact Survey: Final Report</u> (Mountain West Research, 1981), transmission line construction workers did not place noticeable burdens on law enforcement agencies in the Pacific Northwest communities where they resided. In general, these workers were regarded as reasonably decent, well-behaved, friendly people whose expenditures benefited the local communities. Similarly, the law enforcement agencies in these areas did not report that the installation of a transmission line corridor and access roads placed additional burdens on their services.

14. <u>Comment</u>: What effects would a transmission line have on underground and placer mining operations? How would it affect blasting operations? When passing through mining areas, BPA should consult miners on final centerline location and tower placement so as to minimize conflicts with mining operations.

<u>Response</u>: According to mining company executives in the Wallace-Kellogg area of Idaho, a transmission line would not affect underground mining, as flexibility in tower placement allows avoidance of mine shaft entrances. Although tower placement is also flexible enough to avoid most placer operations, towers could interfere with these types of operations in some cases. Where a transmission line would restrict mining operations in any way, BPA may acquire mineral rights in the right-of-way, which would prevent the landowner from mining there. However, BPA does not have a set policy on mineral right acquisition. When BPA elects to acquire mineral rights in an area, we conduct a mineral appraisal to establish its value.

BPA requests that landowners give us 15 days notice before blasting near a transmission line. This notice is required only once and allows us to meet with the landowner to discuss blasting methods.

BPA would consult with landowners on final centerline location and tower placement before installing a line through a mining area.

15. <u>Comment</u>: The presentation of the present net values for timber are somewhat misleading (page IV-13). The values shown represent only the value of future stands that would be lost and do not include values of currently merchantable timber that would be utilized. In other words, the values represent productive forest lands that are currently nonstocked (due to harvests) or stocked with nonmerchantable tress. The discussion should be rewritten to clarify this.

Response: The Final EIS presents additional information which clarifies the assumptions used to derive the net present value figures. Simply, the net present value figures include only value of future growth and do not include currently merchantable timber on the right-of-way which is quantified separately. The net present value figures represent expected revenues from harvests minus expected harvesting and management costs per acre over the next 100 years.

16. <u>Comment</u>: It appears that the more or less permanent removal of timber from the right-of-way and from access roads is termed a "short-term economic impact" (page IV-13). How can it be considered short-term if it must be cleared for the life of the line? Likewise, is land used for access roads removed from production (forestry) for "at least a short time" (page IV-4), or is it permanently removed.

<u>Response</u>: Timber removed from the right-of-way and access roads must be considered from both a long-term and short-term perspective. The initial loss of timber is considered a short-term impact because it is basically a one-time harvest with no loss in value and because the landowner is compensated for the timber.

The loss in productive capacity, because the right-or-way and access roads must continually be cleared, is considered a long-term impact. These losses on the right-of-way are quantified in Volume I (Chapter IV) for various productivity classes. They are not calculated for access roads because the

presence of access roads reduces future management and harvesting costs and therefore would have a positive rather than a negative effect on the potential value of the timber resources in the area.

17. <u>Comment</u>: Mineral County's dependence on the timber industry leaves it opposed to any changes that would reduce timber land in production or that would adversely affect timber producing companies.

<u>Response</u>: The transmission line corridor and associated access roads would remove timber from production for the life of the transmission line. However, access roads could also be used for timber management and harvesting functions and would, therefore, have positive economic impacts on the timber industry as well. Hence, the transmission line's impacts on forestry would be both positive and negative.

18. <u>Comment</u>: In the social and economic considerations, was consideration given to property owners, particularly in agriculture, who are not directly under the corridor? In other words, where lines and towers will not be located on their property, but who are adjacent and would be impacted, was that considered?

Response: Appendix D, "Social and Economic Considerations," page 3-12, presents a discussion of the line's potential inconvenience effects on ranchers and farmers who own land adjacent to, but not in the right-of-way. Agricultural inconvenience effects were noted on adjacent land only when the agricultural operation on it extended to land actually under the line.

19. <u>Comment</u>: Referring to Appendix D, table 3-6, of all the groups that you asked, "do you favor power lines?", the only group that had more than fifty percent in favor of power lines was irrigated farm landowners.

<u>Response</u>: As noted on page 3-6 of Appendix D, "Social and Economic Considerations," respondents were asked whether they favored the construction of a new transmission line in general, without regard to its location. Of the 12 irrigated farm landowners questioned, five favored such a line and four opposed it. However, this question was not intended to determine whether irrigated farm landowners would favor a line across their <u>own</u> property. Irrigated farm landowners could be very inconvenienced by lines across their own property: The concerns they have expressed are clearly presented on page 3-12 of Appendix D. As a result of these concerns, the socioeconomic ranking process considered crossing irrigated farmland as undesirable.

20. <u>Comment</u>: Ranchers and the breeders of purebred Arabian horses are very concerned about the project's potential adverse effects on their animals. These concerns are complicated by the fact that breeders' feel their reputations could be tarnished if their operations were located under or near a transmission line.

<u>Response</u>: Ideally, it would be desirable if farm and ranch land could always be avoided when locating a transmission line. In the reality of the trade-off process, some agricultural land will have to be crossed by the proposed line. (For more discussion of tradeoff effects, see Parts III. C and II. C.) The EIS and the BPA publication <u>Electrical and Biological Effects of</u> <u>Transmission Lines: A Review cite six studies which found that transmission</u> lines do not affect livestock health or reproduction. These include studies of 765-kV lines that produce electric fields 1 1/2 times stronger than would be produced by the proposed 500-kV line.

We are aware of no evidence that transmission line presence has had any effect on the reputation or economic viability of the livestock operators presently located near the thousands of miles of existing transmission lines. A recent court case in the State of New York also confirmed that public apprehension about potential health effects of transmission lines does not affect the value of property near such lines (Court of Claims, Utica, 1982).

21. <u>Comment</u>: Many Western Montana local economies are heavily dependent on tourism that is attracted by the natural environmental beauty of neighboring areas. Tourism is especially important as a source of outside income in places like Mineral and Granite counties, whose economies are not extremely diversified and are currently suffering downturns in their resource-based industries.

If a transmission line were installed in these areas, tourists, vacationers, hunters, and other recreationists would be less likely to visit Western Montana because of adverse visual impacts. The visual impacts would be very noticeable from roads which serve as gateways to the tourist areas, from fishing streams and from public lands. When these non-local visitors reduce their trips to Western Montana, local businesses will be adversely affected. Are the above tourism effects addressed in the EIS and could calculations be made to derive an annual dollar loss from decreased tourism due to the line?

<u>Response</u>: If Western Montana visitors were to decrease their trips to the area in response to construction of a transmission line, then local businesses that depend on tourism would be adversely affected. If these effects were significant, then reduced employment and incomes in the tourist business could spread through the economy and affect other businesses and local government tax revenues as well.

It should be noted that many western Montanans believe that new access roads associated with the transmission line would increase the popularity of the area as a destination for hunters and other recreationists. Hence, the transmission line could have a balancing positive effect on tourism and tourist-related businesses.

Unfortunately, very little evidence exists on tourist responses to site-specific adverse visual impacts. For instance, it is not known whether tourists who view the line would: cease to visit Montana; still visit Montana, but avoid areas where the line is visible; or not change their vacation habits at all. Hence, it is very difficult to predict whether the line would have any adverse effects on tourism or how extensive they would be.

The line's potential effects on tourism were identified as a concern of local residents in Appendix D "Social and Economic Considerations." However, because

of the uncertainties noted above, neither Appendix D nor the EIS assigned dollar values to tourism effects.

22. <u>Comment</u>: Transmission lines and associated access roads would adversely affect animal populations that are important to local residents from both recreation and economic perspectives. In addition, out-of-state hunters might avoid the area in the future because of the line's adverse visual effects.

<u>Response</u>: Interviews with local outfitters revealed strong concerns that as a result of the transmission line, animal populations (and particularly elk) would leave the area or decrease in number. These changes could, in turn, shift the economic benefits of out-of-state hunters' expenditures to other towns or counties, or cause them to decrease.

Local outfitters indicated that some of their clients would be affected by the visual presence of a transmission line and some would not. The most sensitive clients would be those who desire "primitive" hunting experiences and those who stay at lodges or guest ranches, which could be located close to the line. We cannot predict whether such clients would seek such experiences elsewhere or would visit less frequently as a consequence.

It is important to note that although potential economic impacts on outfitters were not an explicit consideration in the socioeconomic ranking of routes, affected animal populations were considered in depth under <u>Wildlife</u> (Chapter IV of the EIS).

23. <u>Comment</u>: Many communities in the project area depend on their beautiful scenic qualities to attract new industries, investors, upper and middle income families, and to recruit professionals. All of these new businesses and people, in turn, support local businesses. By detracting from the scenic beauty of these communities, the transmission line would reduce their attractiveness to new industries and people and consequently limit and reduce their their economic growth potential.

<u>Response</u>: The transmission line may be one of many factors that influence the desirability of industrial and residential site locations. However, most communities also have other sites available that are farther away from or out of sight of the proposed transmission line. These sites would give potential investors, industries, and residents enough flexibility to choose locations that would take advantage of the area's scenic beauty and not be adversely affected by the presence of a transmission line.

24. <u>Comment</u>: How much local labor will be employed during the construction period? Will the construction work be done by the International Brothernood of Electrical Workers (IBEW) union members? Who will get the dollars BPA will spend on construction? The unemployment rate in Western Montana is very high and many local IBEW members are not currently working.

<u>Response</u>: Volume I contains estimates of the work force required to build the line (Chapter IV). The amount of local labor hired for the project's clearing and construction period would depend on the hiring practices of the clearing and construction contractors. Similarly, the number of IBEW union members hired for construction would depend on whether the job is awarded to a union contractor. Research indicates that contractors will spend around 5% of the money they receive from BPA on local purchases of goods and services. The other 95% will be distributed to local and non-local labor or kept as profit by the contractor. We estimate that local labor will spend almost all of their income in the local economy. Non-local labor is expected to spend 40% of their income locally.

25. <u>Comment</u>: Your documentation fails to address any realistic consideration of environmental impacts or impacts on people along the line and the general rate payers.

Response: These subjects are covered in detail in Volume I (Chapter IV) and in Appendix D, "Social and Economic Considerations," which focuses specifically on the project's potential effects on people.

26. <u>Comment</u>: The summary list also uses words such as "many respondents," "several owners," "a few landowners." It has been our experience at all the meetings we have attended, spanning a three year period, that the numbers of people expressing concerns about these social and economic impacts were large and usually these concerns were shared unanimously by the attendees. The use of terms such as "many" or "several" or "a few" instead of "nearly all" or "most" could lead the decision makers to underestimate the importance of these concerns. Indeed, there is even some question whether the interviews conducted by Mountain West Research, whose findings were extensively used in Appendix D, are valid. On page 2-20 BPA admits that the sampling process did not conform to the strict requirements of statistical random samplings, and therefore, any conclusions on social concerns ". . . are not a precise representation of them."

<u>Response</u>: Decisionmakers and others should note that the terms "many residents," "several owners," and "a few landowners," were made in reference to formal socioeconomic interviews with 52 landowners that could be affected by the proposed line. Because the findings of these interviews were highly consistent with those expressed in newspaper articles, scoping meetings, and hearings, it can be assumed that feelings of the 52 respondents were widely held. Although statistical sampling techniques were not used in this interview process, the results were consistent with expressed public opinion noted above and with the results of similar interviews conducted with residents that lived near existing lines in Oregon, Idaho and Washington. Hence, it can be assumed that the results of the 52 formal interviews approximates the types of socioeconomic impacts that are likely to occur should the project be built, even though they cannot be used to state in statistical terms the distribution of opinions held by the general public.

27. <u>Comment</u>: Regarding Table 2.3, Comparison of Alternatives Environmental Ranking Summary, minimizing disruption of people's lives and lifestyles is not proven in the EIS. There may be fewer people living in one area than another, but that doesn't represent the number of people that use the area or can see the line from their homes or favorite recreation spot.

<u>Response</u>: Table 2.3 is a summary comparison that ranks the three alternative plans in relation to each other for a set of environmental and siting considerations. It is one of four comparisons documented in Chapter II of Volume I. For a more complete discussion of the transmission project's impacts on people's lives and lifestyles, see Chapter IV of Volume I and Appendix D, "Social and Economic Considerations." This document shows that the Taft Route would minimize a wide variety of adverse social impacts. The EIS also shows that the Taft Route is best from esthetic and recreation perspectives.

28. <u>Comment</u>: The socioeconomic considerations were not measured through reasonable parameters, giving fair weight to individual socioeconomic criteria. In fact, more attention was given to where the workers would live and eat and what nice guys they would be than to any possible long-term ill health of the people who live in this [Maxville/Flint Creek] vicinity.

<u>Response</u>: Although construction worker impacts were extensively documented in the socioeconomic assessment, these impacts were not given any weight in the route comparison process, because they would be about the same for each route. The socioeconomic ranking criteria dia include concerns for potential health effects by placing significant weight on potential impacts on communities, rural residences, and private land.

29. <u>Comment</u>: One area in the report that I think is greatly underemphasized are social and economic considerations. This report, in other words, the impact report, emphasizes the short-term, positive economic benefits of constructing the power line. Little consideration is given to any real analysis of long-term social and economic problems that will result from the building.

<u>Response</u>: Social and economic impacts of the proposed transmission facilities have both positive and negative aspects. The environmental statement discusses all known changes the project may induce. Although the demonstration of the line's short-term positive economic benefits requires lengthy documentation, long-term social impacts are of more consequence to people in the project area who may be affected. The <u>Social and Economic</u> <u>Considerations</u> portion of the final EIS has been changed to stress this difference.

30. <u>Comment</u>: The portion of this report that deals with the demographic impacts deals only with the short-term demographic impacts, mainly those that take place during construction. It has virtually no information or investigation in the long-term demographic impacts on the community.

<u>Response</u>: Based on the socioeconomic assessment and BPA's experience on similar projects throughout the Pacific Northwest, the project is not expected to have any long-term demographic impacts on local communities.

31. <u>Comment</u>: The BPA report lists many positive economic benefits resulting from the construction of the power line. For example, it states that 5 percent of the line cost will be spent in local communities by providing

short-term jobs. However, it fails to acknowledge that these are only very transient, short-term benefits, and that the long-term effects from an economic point of view are, without exception, negative.

<u>Response</u>: The EIS and Appendix D, "Social and Economic Considerations," discuss short- and long-term economic effects. They both recognize that the short-term effects would be positive and of short duration and that the long-term effects would be primarily negative. It should also be noted that whereas the short-term economic benefits due to construction workers can be quantified, potential long-term effects on property values and tourism are largely unproven and cannot be accurately forecast.

32. <u>Comment</u>: In [Appendix D] section 4, page 37, "Social and Economic Considerations," the BPA states construction and presence of the line in the Missoula-Rattlesnake area would also increase alienation of the public, as the line could pass through a moderate/upper income subdivision. The income of the people should not reflect on a route choice. This adds to my belief that the BPA is not making their choice on environmental reasons but political reasons.

<u>Response</u>: When assigning a particular level of alienation to an individual route segment, the socioeconomic team considered all expressed opposition to that segment, and not the income levels of the commentors. The term "moderate/upper income subdivision" was used to describe the area. Income level was not an influence in assigning levels of alienation to segments passing through the Rattlesnake Valley.

# III. J. ESTHETICS

Many of the commentors that expressed concern about the adverse esthetic impacts of the Garrison-Spokane Transmission Project stressed that people had chosen to live in the potentially affected areas because of their scenic qualities. Hence, the construction of a transmission line in the area would detract from the natural beauty of their local environment and have serious effects on their quality of life.

Other consequences of visual effects were mentioned as well. Many commentors felt that the visual presence of the line would result in property devaluation both under and adjacent to the line (see Part II. J). Others stated that the visual impacts of the line would detract from local area's attractiveness to recreationists, tourists, and vacationers. Still others expressed the view that esthetic effects would discourage economic and residential development.

Some commentors stated that esthetic effects were greater on private land than on public land, and that viewer sensitivity would be greater along a new corridor than along existing rights-of-way. Others stated that more weight should be given to esthetic effects on permanent residents than on passing motorists. Also, several commentors focused on the adverse visual impacts of access roads and cleared rights-of-way in forested areas. And finally, the effect of tower size on esthetic impacts was noted. While comments on esthetics came from numerous communities and rural areas throughout the study area, most of these comments either came from or referred to the places below:

> Maxville, MT St. Regis, MT Philipsburg, MT Tamarack Creek, MT Drummond, MT Lookout Pass Area, MT Flint Creek Valley, MT Osburn, ID Blackfoot Valley, MT Pritchard, ID Potomac, MT Wallace, ID Missoula, MI Hayden Lake, ID Lolo/Miller Creek, MT Thompson Falls, MT Clark Fork Valley, Mf Chilco Lake, ID

Rattlesnake Valley, MT Coeur d'Alene, Il Butler Creek, MT Coeur d'Alene, ID St. Ignatius, Mr Frenchtown, MT Alberton, MT Lothrop, Mr Huson, MT Superior, MT Sixmile Valley, MT Ninemile Valley, MT Tank Creek area, MT Plains, MT

General and specific esthetic impacts and mitigation are detailed in Volume I and in Part II. N of this Volume. Site-specific concerns are discussed in Part IV (GEOGRAPHIC AREAS OF CONCERN) of this Volume. Other comments and responses follow.

1. Comment: A number of people have expressed their concern over the adverse visual impacts of the Garrison-Spokane transmission line. Most were concerned with the line's visibility to nearby residences, particularly their own. Many also expressed concern about the damaging effect the line would have on scenic quality as it relates to livability, tourism, and recreation. They questioned the location of the line and wanted it moved away from people and travel routes.

Response: These are valid concerns. The DEIS acknowledges the high visual impact the line will have, especially in areas of high visibility and/or viewer sensitivity. During the EIS process, effort was made to identify these areas and avoid them if possible. Because of the linear nature of the transmission line, running east to west, some sensitive areas could not be avoided. In these areas, measures to mitigate visual impacts will be employed, including the use of non-specular conductors, darkened towers, improved appearance towers, and selective clearing and access road construction in certain areas. These are discussed under Mitigation Measures in Chapter II of Volume I and in Part II. N of this Volume.

For a more detailed discussion of comments about esthetic impacts that pertain to residences and the local quality of life, please see Parts III. A and III. I of this Volume. Also, many comments and responses in Part IV -GEOGRAPHIC AREAS OF CONCERN of this Volume deal with concerns of local residents for visual effects in specific areas. More detail about how esthetic changes affect recreation may be found in Part III. D. Finally,

comments on the consequences of reduced visual quality for tourism and the local recreation economy may be found in Part III. I.

2. <u>Comment:</u> . . . Aesthetic values comparable to those required under the Public Lands Policy Management Act and the Forest Management Act must be adhered to under public lands and also be adhered to on any private lands that the line might impact. Aesthetically, I'm drawing your attention to the high aesthetic values concerning the visible impact by private landowners.

<u>Response</u>: BPA is working closely with the US Forest Service, and the Bureau of Land Management, cooperating agencies in preparation of this EIS, to ensure consistency with visual resource management objectives of the Federal Land Policy and Management Act and the National Forest Management Act both on public lands. Although the acts do not apply to private land, the motivation and mitigation efforts are designed consistently across the study area.

3. <u>Comment</u>: The Viewer Sensitivity map (Appendix C) shows that it's real sensitive around the existing rights-of-way [particular concern for right-of-way between Hot Springs and Thompson Falls], but you don't ever make any effort to explain that four or five lines are already in that right-of-way. Yeah, that's real viewer sensitive there.

<u>Response</u>: "Viewer sensitivity" is a measure of people's concern for the visual environment. Viewers are not necessarily less sensitive where lines are already in place. The fact that there may be fewer changes in the environment in the vicinity of existing lines than in other areas was considered under "visual alteration."

4. <u>Comment</u>: One of the reasons people live in this [valley] is because of the scenery. Why is more consideration given to people that are passing through our valley, seeing the line for about ten minutes, than to those who will have a distorted horizon for the rest of their lives?

<u>Response</u>: Although a major consideration, the passing motorist was only one of many factors that were considered. Residents were given substantial consideration in both this and in other resource topics.

5. <u>Comment</u>: Access roads to the BPA facilities would also be environmentall unsound as well as creating a visual blight [especially near Alberton and Ninemile Valley].

<u>Response</u>: As discussed in the DEIS, in many cases, access roads are the main visual impact. In general, BPA attempts to site access roads to cause as little scarring and visual intrusion as possible. In particularly sensitive areas, special measures such as limited road building or alternate access entry have been included as part of the proposal (see <u>Mitigation Measures</u> in Chapter II of Volume I). However, in certain areas this is not possible, and there will still be visual effects from access roads.

6. <u>Comment</u>: I'm correct that the aesthetic impact would be significantly less with the C [Taft] line, smaller towers, for example?

<u>Response</u>: Esthetic impact assessments are based on many factors and cannot be determined by tower size alone. For example, a smaller line going through forest with steep terrain will require a cleared right-of-way that could be highly visible. It may have significantly greater impacts than a large line through rolling rangeland, because of the latter's capability to absorb a line.

7. <u>Comment</u>: The mitigation measures ("heightening the visibility of transmission line with aerial markers") would further increase the already devastating visual impact of the line. The DEIS shows no awareness of this.

Response: BPA is aware of the apparent contradiction between minimizing visibility of the line by special measures and the use of aerial markings to increase visibility. BPA tries to avoid situations that require aerial markers, but is required to follow FAA regulations.

# III. K. WILDLIFE

Commentors were primarily concerned with the transmission line's impacts to wildlife and the accuracy of BPA's impact analysis. Adverse effects on big game, bird, and fish habitats were all addressed. A major issue was concern for potential loss of critical big game habitat, particularly as it might affect elk and bighorn sheep populations. The impacts on big game from increased disturbance and hunting pressures, due to the greater accessibility provided by access roads, especially along the Tatt Route, was another concern. Fears of adverse impacts to endangered and threatened species, including the grizzly bear, peregrine falcon, and gray wolf were expressed. Additionally, commentors expressed concern over the collision hazard to birds, especially bald eagles, presented by the line's conductors. Comments on adverse impacts to fisheries resulting from increased erosion and sedimentation were also noted.

Opinions that BPA ignored or understated wildlife impacts and underemphasized habitat quality in the DEIS were voiced. Other comments suggested more wildlife data was needed and requested that new inventories, particularly on big game, be performed and considered. In addition it was demanded that all wildlife impacts be effectively mitigated.

General and specific impacts to wildlife are discussed in Chapter IV of the EIS. Other comments and responses follow.

1. <u>Comment</u>: Construction and presence of the line will adversely affect big game. This is particularly true where large swaths of forest land will be cleared, such as on the Taft Route.

<u>Comment</u>: By using the forests for the power line, there will be a greater impact on wildlife and vegetation. There are bald eagles, peregrine falcons, and possibly grey wolves along the Taft route which are endangered or threatened. If we continue to disturb the habitat of the golden eagle, blue heron, ducks, coyotes, fox, mountain lion, deer, elk, moose and bear they may soon be endangered. Putting a power line through an area where there aren't any certainly does not help. Since we have power lines, freeways and railroad tracks in the valleys, we should try to save the aesthetic values of the forests. (All wildlife mentioned above have been seen on the Taft route.)

<u>Comment</u>: Most specifically we do not want them going up the Beaver Creek Road Canyon as this would be devastating to the aesthetics, agricultural use value and wildlife of such a narrow little canyon.

<u>Comment</u>: Supply and demand is one thing, but creating a demand [for power] in a sense while [the line would] impact other resources, such as fisheries, wildlife habitat. . .is quite another. . . .the environmental impact on wildlife and fisheries could be catastrophic at this time.

<u>Response</u>: Construction of the transmission line will affect big game in several ways. Clearing of the right-of-way and construction of access roads will result in the removal of thermal and escape cover. These would be considered long-term impacts. (Clearing will also tend to increase the supply of new forage.) Construction activities will result in short-term disturbance, which may displace big game from the area during construction. The primary impact to big game would be from increasing access into areas. This may result in increased harassment (disturbance) and hunting pressure on big game.

Based on numerous studies of impacts of transmission lines on wildlife, and taking into consideration wildlife species in the project area, it is not expected that the proposed transmission line will cause any species to become endangered or cause catastrophic effects.

The Taft plan was located in large part to reduce affects on people-related concerns. The tradeoffs of such a routing include crossing a generally more remote, forested landscape and consequent implications for the natural environment, including vegetation and wildlife. Although balancing such tradeoffs is never easy, the determination of environmental preference-based heavily on popular concern for human and land use issues--was that the Taft plan would cause the least impact. Also see Parts II. C and II. G. 2 for discussion of similar issues.

As discussed in Chapter II of Volume I, under <u>Mitigation Measures</u>, these impacts can be mitigated to a large degree through timing restrictions on construction activities, minimizing the clearing of the right-of-way, revegetating disturbed sites, and by closing access roads. Once a route is selected, BPA will work with appropriate agencies (Forest Service, Montana Department of Fish, Wildlife and Parks) in further developing and implementing mitigation measures in critical big game areas.

2. <u>Comment</u>: Alternative A [Hot Springs] shows a higher impact on wildlife, despite the fact that route A is along an existing route for over half its length.

<u>Response</u>: The alternative routes cross similar amounts of big game range. Paralleling the existing corridor would require fewer new roads than a new corridor and would generally have less impact on big game. However, Alternative A crosses a greater amount of important habitat for other species (such as waterfowl, bald eagle, osprey, etc.), and for this reason received a higher impact rating.

3. <u>Comment</u>: No mention is made in the BPA report of the bighorn sheep population that has been established in the Clark Fork River Canyon and also in the vicinity of St. Regis. I would ask that a complete inventory be made of all species that inhabit the impact area, and that the potential effect of the power lines on each species be investigated.

<u>Response</u>: The bighorn sheep population in the Clark Fork River Canyon and near St. Regis are represented in the wildlife maps (fig. 4.6).. Impacts on bighorn sheep were evaluated and summarized as part of the overall evaluation of impacts to big game.

It is not feasible to inventory all wildlife species in the project area. In conjunction with the Forest Service, Bureau of Land Management, and State game agencies, BPA identified representative wildlife species (key species) for evaluation of potential effects of the transmission line.

4. <u>Comment</u>: What . . . is a mile of a wildlife? You've got one elk and one antelope that walks under, that means that's wildlife habitat. . . how about looking at wildlife quality and not just quantity? You're looking at quantity in terms of miles. Why can't you look at habitat as prime winter range, get your crews in there to go camping and watch the things.

<u>Response</u>: In evaluating wildlife habitat, miles and acreage were used for comparison between routes. (See table 4.3 of Volume I for miles.) Where information existed, the wildlife habitat was also evaluated with respect to quality (i.e., general big game range vs. critical big game range).

5. <u>Comment:</u> . . . After all these years of Bonneville existing in this area, I read in the <u>Missoulian</u> that finally they're going to do a study on the effect of power lines on the elk. Well, when I lived up on my property, I watched the elk and I can tell you exactly what they did. They hesitated when those lines danced and whereas they always traveled down into Clark Creek, very few of them do anymore because of those lines.

It is also stated that no significant big game impacts would occur, but there is no evidence supporting this. I would like to see a study done on the effects large power lines have on big game, preferably by another agency.

<u>Response</u>: A study is presently being conducted by the Forest Service (Deerlodge National Forest) to determine the effects of a double-circuit 500-kV transmission line on elk. BPA also sponsored a study to determine the effect of a 500-kV transmission line on big game movement (Goodwin, J.G., 1975. Big Game Movement Near a 500-kV Transmission Line in Northern Idaho. Prepared for Bonneville Power Administration, Fortland, Oregon.) This study concluded that the transmission line did not adversely affect big game movement.

6. <u>Comment</u>: The only area mentioned for bald eagles is the area north of St. Regis yet the map in appendix C shows bald eagles in the Rock Creek and Bitterroot River area. It is stated that no other endangered species is encountered, yet the peregrine falcon is shown in the Rock Creek and Ninemile area.

<u>Response</u>: The peregrine falcon areas shown on the map in Appendix C are historical peregrine eyries. Presently these sites are not occupied. Bald eagles are discussed on pages IV-31, IV-43, IV-50, IV-57, and IV. 68 of the DEIS.

7. <u>Comment</u>: Table 2.4 - Advantages/Disaovantages, Disaovantage No. 6, states, "No adverse effect on endangered or threatened species." [The commentor disagreed with this statement.]

<u>Response</u>: BPA prepared biological assessments on the bald eagle, peregrine falcon, grizzly bear, and gray wolf to assess the effect of the transmission line on these species as required by the Endangered Species Act. BPA's assessments made "no effect" determinations. The U.S. Fish and Wildlife Service, to whom the assessments were submitted, concurred with BPA's findings.

8. <u>Comment</u>: The proposed power line will cross through grizzly bear foraging areas from the Flathead Reservation boundary to where it will cross U.S. Highway 93. We reference the Bureau of Indian Affairs Finley Logging Unit Environmental Assessment for impact analysis.

Table 2.2, Comparison of Alternatives: Data Summary, states that for Plan A, 1.9 miles of line for both route Al and route A2 will go through grizzly habitat. The line will actually traverse about five miles of grizzly foraging area for either route.

<u>Response</u>: The information collected on grizzly bears in the project area was obtained from the Bureau of Indian Aftairs (BIA) and the U.S. Forest Service (FS). The grizzly bear habitat identified in the DEIS was that area being considered for designation as essential grizzly habitat. Based on information from the BIA and FS, no viable grizzly bear population exists in this area. BPA prepared biological assessments for the grizzly and made "no effect" determinations. The U.S. Fish and Wildlife concurred with this finding. Even if five miles of foraging habitat should be crossed, it is not expected this would affect the grizzly. If a route is chosen through grizzly habitat, BPA will consult with the appropriate agencies to determine the need for special mitigation measures.

## III. L. VEGETATION

Commentors expressed some concern regarding the removal or disturbance of natural vegetation, including impacts associated with vegetation disturbance, such as increased runoff, erosion, and sedimentation. Also of interest were the provisions being made by BPA for revegetation of disturbed sites. They perceived a need for a more complete discussion in the Final EIS of BPA's vegetation management policy, particularly herbicide use. Other issues raised include: the use of vegetation to screen transmission towers, concern for impacts to botanical study areas and fisheries, and the avoidance or minimization of impacts to wetland vegetation.

General and specific impacts on vegetation are discussed in Chapter IV of Volume I. Vegetation Management is also discussed in Chapter IV, as well as in the Vegetation Management Program EIS, available from BPA in the spring of 1983. Other comments and responses follow.

1. <u>Comment</u>: I would like to ask what provisions are being made for revegetation of the corridor?

<u>Response</u>: As stated in the EIS, Chapter II, disturbed areas are seeded with quick-growing grass species easily adaptable to the site and fertilized if necessary. Provisions for revegetation generally go hand in hand with standard erosion control measures such as drainage structures and low-gradient road cuts in fragile or problem areas.

2. <u>Comment</u>: The need to use herbicides to control vegetation on the transmission line right-of-way has a generic justification that may not be applicable to this project, especially east of the Idaho-Montana line (see page IV-7). The use of herbicides concerns many people, and its use should only be advocated when the growth of deciduous vegetation justifies it. The potential use of herbicides can be better addressed in the section "Discussions," starting on page IV-35.

Response: The basis for all of BPA's right-of-way vegetation management activities is a series of site-specific prescriptions for control of hazard vegetation. By tailoring each of these prescriptions to the exact site, the objective is to control hazard vegetation species, while preserving low-growing vegetation or other natural features. Such detail is not known until site-specific work begins, and thus would not yet be available for inclusion in the site-specific Section Discussions referenced above.

We agree that the selective use of herbicides may be more applicable west of the Idaho-Montana state line. However, herbicides may be required as a tool to limit tall growing "hazard" tree species along the entire right-of-way. Ground applications may also be needed to maintain access roads, or to control individual trees on the right-of-way.

To address public concerns, BPA will monitor water for herbicide residues upon request, using both BPA and National Forest Service herbicide use policies and/or standards. BPA is currently conducting research in cooperation with

the University of Washington and Washington State University to develop new vegetation management techniques suitable for use in municipal watersheas or other sensitive areas.

3. <u>Comment</u>: The preferred alternative [Tart plan] also crosses the hignest number of municipal watersheds. We encourage the BPA to minimize use of herbicides in these situations. A more complete discussion of BPA's practices in regards to vegetation management and to their current efforts underway in the area of intergrated pest management would help clarify this often controversial issue (EPA).

<u>Response</u>: As noted in Volume I, great care is taken to prevent the introduction of herbicides into bodies of water, especially within municipal watersheds. Herbicides are not applied aerially within 100 feet of a body of water (aerial applications are typically not used in Montana); selective ground application is not made within 10 feet of water bodies, except for treatment of stumps with herbicides approved by EPA for use in such areas. BPA's herbicide residue monitoring program has shown these and other precautions (such as those relied upon to minimize drift) to be effective in preventing herbicides from entering bodies of water.

BPA's Vegetation Management Program is highly selective and is consistent with the principles of Integrated Pest Management (IPM). IPM (as defined by the Council of Environmental Quality) is a systematic process for selecting and using pest control methods. BPA field personnel use computerized right-of-way inventories, aerial photography, and field investigations in developing the methods of vegetation control. This enables them to identify sensitive areas (i.e., bodies of water, crops, pasture) to be avoided. Methods of control are carefully tailored to the conditions within each section of right-of-way.

Laboratory analyses and field monitoring have shown that the herbicides used by BPA readily degrade in the environment and that, if ingested, they are rapidly excreted (they do not bioaccumulate). These facts, along with facts concerning the toxicological properties of the herbicides used by BPA, lead to our conclusion that BPA's use of herbicides in accordance with EPA label instructions constitutes a very low risk to humans and the environment (including game and other wildlife species). Further information is contained in BPA's Vegetative Management Program EIS, available on request.

4. <u>Comment</u>: As I am extremely sensitive to any [2,4-D] related herbicide, part of the reason we purchased this land was in order to find a residence away from any areas which are near herbicide spraying. BPA practices not only regular from-the-ground herbicide spraying in order to control vegetation growth under a powerline, but also aerial spraying which can literally drift for miles.

<u>Response</u>: In general, aerial application of herbicides is not the method of choice for much of BPA's transmission line rights-of-way in the State of Montana. The majority of vegetation control would be by means of hand cutting (with herbicide treatment to stumps of resprouting species) and selective (spot) ground application of herbicides. Regardless of which method is used,

however, great care is taken to prevent drift onto and impact upon non-target areas. Most of the herbicides used by BPA have a low volatility. BPA's maintence standards specify conditions under which various herbicide applications can be made. Included in these conditions are adherence to buffer strips adjacent to bodies of water, not applying herbicides when weather conditions are unfavorable, and incorporation of positive placement measures to minimize drift (i.e., use of additives to thicken the mixture, use of specially designed equipment). The effectiveness of these measures has been verified through experience and periodic herbicide residue monitoring.

5. <u>Comment</u>: We also feel that additional access roads can adversely affect fisheries habitat and aquatic environments by increasing sedimentation.

<u>Response</u>: As noted in the EIS, sedimentation can adversely affect aquatic insect and fisheries habitats from construction of new access roads. However, in most cases, sedimentation resulting from construction activities would be short-term, and of low significance. Most of the streams are crossed at nearly right angles by the project or would be at a short angle rather than paralleling for a long distance. This reduces the potential for long-term significant impacts.

# **Geographic Areas of Concern**

### IV. GEOGRAPHIC AREAS OF CONCERN

# IV. A. FLINT CREEK VALLEY

Many Flint Creek Valley residents have spent time developing reputations in the purebred livestock business or installing expensive irrigation systems. Hence, many of their comments focused on the project's potential impacts on ranching and farming operations. Where these issues are treated generally under Part II - SUBJECTS OF CONTROVERSY or Part III - RESOURCE CONCERNS, references to the relevant parts are shown below in parenthesis.

Many of the comments concern the removal of prime agricultural land from production and potential interference with above-ground and underground irrigation systems (see Part III. C). Also of concern were safety of agricultural activities, effects on irrigation equipment, and inconvenience impacts of working around transmission lines (see Parts II. H and I).

Other commentors focused on property value effects, voicing concern particularly about possible devaluation of rangeland that could later be used for higher uses such as housing (see Part II. J). A few commentors complained about a perceived lack of public input during the earlier stages of scoping and site selection. Many stated that with the abundance of public land in the area, the line should avoid private land whenever possible (see Part II. I). Several others stated that the area's visual amenities were important, both in terms of litestyle and in terms of economic livelihood. Hence, they were worried about the project's esthetic effects on local qualities of life and on the local people who are economically dependent on the recreational appeal of the Flint Creek Area (see Parts III. I and III. J).

A few commentors questioned the accuracy of the agricultural maps and data presented in the EIS and stated that the route ranking forms were difficult to interpret (see Parts II. G and III. C).

#### IV. B. MAXVILLE/HALL

Maxville/Hall area residents share interest in a range of study-area-wide issues and voice strong concern about many local issues as well. Where these issues are treated generally under Part II - SUBJECTS OF CONTROVERSY or Part III - RESOURCE CONCERNS, references to the relevant Parts are shown below in parenthesis. Most of the concerns of residents in the Maxville/Hall area revolved around one central issue: That, if the Taft Plan is built, an alternative to the present location across the Flint Creek Valley at Maxville should be developed. The residents here were in accord that such an alternative should avoid residents and agricultural land. In doing so, potential health effects, visual intrusion, and effects on lifestyles would not occur. The general concern to avoid residences and farmland is discussed under Parts II. G. 3, II. I, III. A, and III. C.

About thirty individual comments and one petition with about 50 names expressed support for an alternative route (Corridor E) to the south of Maxville (See figure 5). The commentors stated that Corridor E would have

less impact on people, private land, sensitive soils, agriculture, recreation areas, cultural resources, water resources, and wildlife than the least-impact Taft Route. Many requested that Corridor E be studied before the close of the EIS process. Others expressed a desire to see maximum use of Federal land whenever possible. A few commentors voiced opposition to Corridor E. Comments and responses dealing with Corridor E in particular appear after this summary.

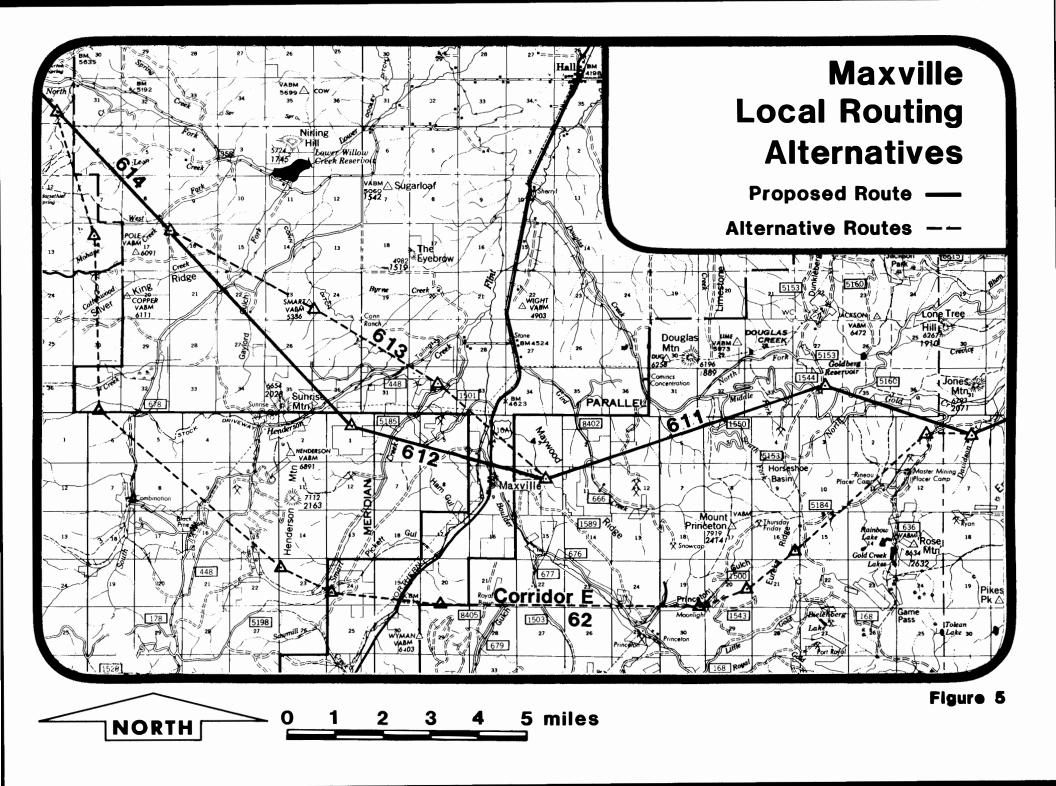
Among the most frequently addressed issues in the area were property values and health/safety. Some residents complained that they were already experiencing difficulty in selling their land and that landowners who had land adjacent to, but not in, the right-of-way should be compensated for land value effects (see Part II. J). The health/safety comments focused on the perceived uncertainty of long-term health effects from high-voltage transmission lines and the need for more research on the subject (see Part II. H). A few people stated that construction of the line should be delayed until local residents could be assured that their health and property values would not be jeopardized.

Several comments from Maxville/Hall residents stated that landowners who could be affected by the project were not notified in a timely manner or enough in advance to influence the siting process. A few commentors stated that lack of a local routing alternative away from Maxville on the Taft Route represented a "technical bias" that unfairly disregarded Maxville. Several commentors felt that an EIS hearing should be held in Maxville (see Part II. G).

Many commentors focused on the draft EIS, noting inaccuracies in the irrigated agriculture maps, expressing uncertainty about criteria used to define urban/residential and undeveloped/ subdivided land, and disagreeing with the low socioeconomic ratings given to Maxville.

People also posed questions about need for the line, given the decrease in load projections (see Part II. A), about the potential for paralleling by future lines (see Part II. C), and about BPA's ability and plans to make payment in-lieu-of-taxes (see Part II. K). Their comments on local impacts covered agriculture [especially potential impacts on purebred cattle and horse breeding operations (see Parts III. C and II. H)], and impacts on mining operations when the line would pass near a mining claim (see Part III. I).

Many commentors expressed concern about the potential nuisance of having to "listen" to the line in wet weather and about its potential effects on their TV and radio reception (see Part II. H). One commentor asked about the possibility of undergrounding in Granite County (see Part II. M). Many stated that the line's visual effects would disrupt lifestyles of people who did without modern conveniences and who, therefore, also preferred not to be disturbed by modern intrusions such as transmission lines (see Part III. I). Other comments noted the importance of natural visual qualities to the area's recreation economy, on which many local residents are dependent (see Part III. I). A few commentors also expressed concern about access roads opening up secluded areas to non-local recreationists who would destroy local enjoyment of these areas (see Part III. I).



If and when the line and access roads are constructed, several people expressed a desire for BPA to accept responsibility for proper maintenance of land, roads, gates, and fences affected by the line. Several also asked BPA to cooperate with local landowners in locating access roads and towers and to consider helicopter construction whenever possible (see Part II. L). A few people expressed a desire to have mitigation measures guaranteed in writing before construction could begin. General and specific discussions on this subject appear in Chapter IV of Volume I.

1. <u>Comment</u>: In the Maxville case, locating Segment 132 where it is not explained, justified, or in any way discussed. That the existence of Maxville was not addressed at all in locating Segment 132 is inexcusable. That no alternative segments to Segment 132 were ever identified for basic comparison and data development purposes is a clear indication of the highly manipulated methodology used to favor technical bias over human consideration.

<u>Response</u>: Route Segment 132 (now Segment 612; see figure 5) of the Taft Plan is located north of the community of Maxville. The route location method is summarized in the EIS and explained in Appendix A. Impacts of this route alternative are discussed for affected resources and land use concerns in Chapters II and IV of Volume I. The entire study area was evaluated to determine suitable corridor location, and within those corridors the proposed Taft route and four other alternatives to the north in the lower Flint Creek Valley and Garnet Mountains were analyzed. (Also see response to comment #9 in this Part.) In response to concerns expressed by residents of the Maxville area, additional local routing adjustments have been evaluated and are presented here in the final EIS along with mitigating measures to reduce or avoid adverse effects of constructing the power line.

2. Comment: Concerns were expressed about numerous impacts and siting concerns along the current Maxville route location, and strong preferences suggested for an "E" corridor to the south.

<u>Comment</u>: If the reason the southern route (south of Maxville) is not being taken seriously is because of monetary reasons, think about this: the residents that this line goes near are going to have to live with it for as long as it stands. I'm sure that taking a little more time and money, the BPA could put the line any place they took a mind to. I see no reason why your vast resources must be used to severely disrupt an entire community.

<u>Response</u>: A high level of concern was expressed by area residents over the original route location in the Maxville area. In an effort to minimize impacts, three possible alternative routing options in this area (tigure 5) were identified and analyzed by the interdisciplinary study team. The first alternative is the original environmentally preferred route (Taft Plan). It comes closest to Maxville and is identified as Route A in this comparative analysis. Its segments (611, 612, and 614) reflect revised locations for earlier segments.) A second alternative (segments 611, 613, and 614), a modification of the originally preferred (segments 130, 132, 134) route which would stay farther north of Maxville, as suggested by public comment and by the Forest Service, is identified as Route A'. The third option (Segment 62),

supported by the Granite County Alliance, is located within the E Corridor south of Maxville and is referred to henceforth as "Corridor E".

Corridor E was modified on the east end to reduce line length and the number of heavy angles, and to avoid areas of concern identified by the Forest Service. A route was located in Corridor E to take advantage of existing roads while minimizing angles and to have the least visual impact on the Princeton area, Highway 10A, and Philipsburg.

The route in Corridor E is 4.7 miles longer and has significantly more miles of access required in the high category. Existing roads would connect this route with main thoroughfares, but there are few existing roads that would provide for access to each individual tower. Much of the terrain is rugged, with steep sideslopes, thereby lengthening the amount of new access required. Route A crosses much less rugged terrain containing many existing roads that with some additional work and lengthening would readily provide access to towers. The access requirements for route A have been updated and found to be less than originally anticipated.

Corridor E was preferred for three resource categories: urban/residential, socioeconomics, and agriculture. The original route is within 1/2 mile of 19 residences, mostly in Maxville. Corridor E is located farther away and out of sight of Maxville and does not come closer than 1/2 mile to any residence. Corridor E crosses much less private land as well (3.6 miles against 9.4 for the original route and 10.9 for the north adjustment). It also crosses no undeveloped subdivided land. Although none of the three options crosses much agricultural land (0.4 miles for E, 0.7 for the original, 1.6 for the adjustment), E is clearly preferred. It crosses no irrigated land, would take less land out of production, would interfere less with farming operations, and would cause less inconvenience with access road gates and cattleguards. Both the northern options have distinctly higher levels of alienation and would clearly be less preferred from a socioeconomic standpoint. It is primarily for these reasons that the southern option in Corridor E reduces impacts in the above-mentioned categories. (Also see table 2.)

The esthetics analysis favored the original route. Although Maxville residents would have close views of parts of the line, in considering additional measures of esthetic impact (visibility, visual quality, visual compatibility and ability to mitigate), the total impact along the Corridor E route is clearly more severe. The steeply sloping mountains and narrow valleys, the highly scenic quality of the landscape, the greater potential for scarring from more access roads, and the lower compatibility of the landscape with the line, all combine to indicate greater visual impacts along the Corridor E route. Of the three alternatives, the originally preferred route would be least visible to travelers on the Pintlar Scenic Highway (Highway 10-A).

Impacts on wildlife, geology/soils, vegetation, water resources, and torestry all favored the two northern routes over Corridor E. The southern route would remove or otherwise affect more critical big game winter range.

# Table 2 Local Routing Alternatives: Data Summary (Miles)

|           |                                  |                       | Geol<br>/Hyd<br>Lo | RO                   |                   |                | WILD        | LIFE         |                 |                         |                            | LAN<br>LANI       | id Us<br>D Co |                |             | AG        | RICU           | JLTU           | IRE  |                            | LAN               | DOW   | NER                | SHIP              |                             |             | ORES              |                |                     | VISU                     | AL RE            | ESOL                 | JRCE         | 5                    | CULT.<br>RES.                      |
|-----------|----------------------------------|-----------------------|--------------------|----------------------|-------------------|----------------|-------------|--------------|-----------------|-------------------------|----------------------------|-------------------|---------------|----------------|-------------|-----------|----------------|----------------|--|----------------------------|-------------------|-------|--------------------|-------------------|-----------------------------|-------------|-------------------|----------------|---------------------|--------------------------|------------------|----------------------|--------------|----------------------|------------------------------------|
|           | Segments                         | Miles                 | Slope 30+%         | Municipal Watersheds | Big Game          | Bald Eagle     | Озргеу      | Grizzly Bear | Waterfowl       | Game Refuge-Mgmt. Areas | Residences within 1/2 Mile | Agricultural Land | Forest Land   | Rangeland      | Wetlands    | Irrigated | Non-Irriga ted | Prime Farmland | Additional Farmland of<br>Statewide Importance | Roadless Area <sup>1</sup> | Federal           | State | Indian Reservation | Private           | Undeveloped Subdivided Land | High        | Moderate          | Low            | High Visual Quality | Low Visual Compatibility | Visua<br>Gi<br>T | Moderate<br>Moderate | sitivity     | High Viewer Exposure | Area of High Sansitivity To Impact |
|           | 62                               | 27.4                  | 8.7                | 0                    | 15.7              | 0              | 0           | 0            | 0               | 0                       | 2                          | • 3               | 25.6          | 1.4            | 0           | •3        | 0              | 0              | 0  | 0                          | 23.8              | 0     | 0                  | 3.6               | o                           | 0           | 14.2              | 11.4           | 27.1                | 21.1                     | 1.8              | 1.0                  | 24.6         | 0                    | 12.5                               |
| MAXVILLE  | 611,612,614                      | 22.7                  | •7                 | 0                    | 20.5              | 0              | 0           | 0            | 0               | 0                       | 19                         | • 3               | 18.4          | 3.9            | 0           | •3        | 0              | 0              | 0  | 0                          | 11.9              | 1.1   | 0                  | 9•4               | 0                           | 0           | 11.9              | 6.5            | 22.7                | 14.2                     | 1.7              | .4                   | 20.6         | 0                    | 10.5                               |
|           | 611,613,614                      | 22.1                  | .7                 | 0                    | 20.2              | 0              | 0           | 0            | 0               | 0                       | 8                          | 1.2               | 13.5          | 7.4            | 0           | 1.2       | 0              | 0              | 0  | 0                          | 10.0              | 1.5   | 0                  | 10.9              | 0                           | 0           | 8.5               | 5.0            | 22.1                | 13.1                     | 2.9              | .4                   | 19.1         | 0                    | 11.5                               |
| BLUE MT.  | 81<br>821,822,824<br>821,823,824 | 5+5  <br>5+9  <br>6+1 | 1.6<br>2.7<br>3.7  | 0<br>0<br>0          | 2.4<br>2.7<br>2.6 | •9<br>•7<br>•7 | 0<br>0<br>0 | 0<br>0<br>0  | 1.0<br>.9<br>.9 | 0<br>0<br>0             | 7<br>12<br>12              | .3<br>.3<br>.3    |               | .3<br>.7<br>.4 | 0<br>0<br>0 | 0 0       | .3<br>.3<br>.3 | 0<br>0<br>0    | 0<br>0<br>0                                    | 0<br>0<br>0                | 2.0<br>2.0<br>1.4 |       | 0<br>0<br>0        | 2.5<br>2.9<br>3.7 | 0<br>•5<br>  1.6            | 0<br>0<br>0 | 4.5<br>4.5<br>5.0 | •3<br>•4<br>•4 | .7                  | 4.]<br>1.7<br>4.9        | 1.5              | 0                    | 4.4          | 1.9<br>1.0<br>1.0    | 1.0                                |
| POTOMAC   | 71<br>72                         | 7.1<br>7.6            | 0                  | 0<br>0               | 2.6<br>1.5        | 0              | 0           | 0            | 0<br>0          | 0                       | 1<br>0                     | 0                 | 7.1<br>7.6    | 0              | 0           | 0         | 0              | 0              | 0  | 0                          | 0                 | •4    | 0                  | 6.7<br>5.5        | 0                           |             | 2.8<br>4.2        |                |                     |                          | .8<br>1.2        | 0                    | 6.3<br>- 6.4 | 0                    | 0                                  |
| ST. REGIS | 95<br>91                         | 16.3<br>17.4          |                    | 0                    | 14.0<br>8.5       |                | 0           | 0<br>0       | 1.8<br>2.0      | 0<br>0                  | 8                          | 0<br>C            | 16.3<br>17.4  | 0              | 0<br>0      | c<br>o    | 0              | 0<br>0         | 0<br>0   |                            | 13.3<br>14.4      |       | 0                  | 1.5<br>2.0        | 0                           |             | 9.1<br>9.2        |                |                     |                          |                  |                      |              | 13.1<br>6.7          |                                    |

1 Included in this category are both RARE II areas (as of December, 1980) and areas managed for the unroaded condition under Planning Unit management plans. Management objectives for RARE II lands have since been resolved and some of these areas have been returned to multiple-use management.

Corridor E would significantly disturb natural and timber resources since the terrain it crosses is highly unsuitable for transmission line development. It crosses many steep unstable slopes, and extensive areas of rock outcrops, talus, and shallow soils; it is at higher overall elevations, and would require significantly more access. Amounts of clearing and disturbance with consequent erosion and sedimentation would be higher. Corridor E crosses more timbered land, and more of this land has higher productive potential and is under management than either northern route.

From an engineering aspect, the northern options are ranked equal and significantly better than Corridor E. The southern alternative is more costly, has far greater access requirements, would be considerably more difficult to construct and would be less reliable due to the snow and elevation factors.

The Corridor E route was also least favored for recreation and cultural resource impacts as well. It crosses close to undeveloped high-use campsites; crosses more of better known fishing streams; and encounters an undeveloped hunting and elk security area which is presently used by an outfitter and which is likely to be used in the future by a dude ranch. Along this corridor, the backcountry or wildland status is the prime attraction, which construction of the transmission line would seriously alter. The northern options have fewer potential impacts and more of them are indirect. For cultural resources, Corridor E would increase access to, visually intrude upon, or disturb more structures which possess more historic integrity. Historic sites along those options are generally in worse condition than sites along Route E.

In summary, although the Corridor E alternative would have decidedly less effect on the area's socioeconomic concerns, it would not eliminate these concerns. The lower human factor impacts were significantly outweighed by the greater potential impacts on esthetics, natural resources, and engineering concerns, which would be serious, extensive, and difficult to mitigate. The original route (segments 611, 612, 614) was determined as the environmentally preferable option, with the Route A' second choice (subject to local preference). Both northern alternatives were significantly favored over Corridor E (segment 62) in the study team's overall environmental analysis.

In addition to consideration of the alternative alignments, several mitigation measures have been incorporated into the proposed route to reduce visual, land use, and other socioeconomic impacts summarized above. Other proposed mitigation measures for the Maxville/Hall area include: the use of non-specular conductors and treated towers; minimizing the clearing and topping of trees, particularly at the lOA crossing; the use of improved appearance towers or towers located as far back from Highway 10-A as possible; and the close coordination of centerline and tower location with local residents.

3. <u>Comment</u>: When one evaluates routes through Corridor E using the analysis maps in the Draft Environmental Impact Statement, information can be found which further supports contentions that Corridor E is a more desirable area for the line location than the Taft route.

<u>Response</u>: Corridor impact maps were designed to reflect resource data collected for 33 data categories mapped at small scale for the entire Garrison-Missoula study area. Those 33 categories were selected to differentiate levels of potential impact sufficiently to define broad (1- to 10-mile-wide) corridors. As the project has progressed from the identification of general resources and issues to the location and detailed study of buildable routes, increasingly detailed studies have been completed. Adjustments, updates, and revisions are commonly made in analyses as more and better information becomes known. Thus, the corridor maps are not sufficient in themselves to measure or interpret actual impacts. They provide a starting point from which resource analysts can conduct extensive field work and collect additional data identified as necessary to determine impacts. To compare final route rankings by means of the information on these maps alone goes beyond their function and reliability. (See response to previous comment.)

4. <u>Comment</u>: The amount of land with moderate erosion susceptibility would be cut in half by using Corridor E. Three miles with moderate erosion susceptibility would be crossed in Corridor E as opposed to six miles crossed in the Taft route. This amount with high susceptibility is exactly the same on both routes.

<u>Comment</u>: The land crossed with geological mass movement potential would be reduced in Corridor E from three miles on the Taft route to two miles on Corridor E.

[Note: In this and the next four comments, the figures mentioned are measurements taken from the maps in Appendix C "Map Volume."]

<u>Response</u>: BPA measurements of the maps show that Corridor E crosses less area of moderate erosion susceptibility (4.2 vs. 6.8 miles) and mass movement potential (2.2 vs. 3.5 miles) than the proposed route. But Corridor E also encounters greater area of high erosion and high mass movement potential (4.3 vs. 1.9 miles for both categories). Maps of erosion susceptibility and mass movement potential were compiled from U.S. Forest Service maps of land suitability for electrical transmission lines. As stated in the response above, these maps are general in nature and give only an approximate representation of potential impacts. They were used to delineate broad corridors, not to measure impacts along linear routes. It should be emphasized that the geologic impact maps in Volume I and Appendix C were neither the only nor the dominant source of geologic and soils information employed in the route comparisons.

In addition to the map data, field observations and detailed geology/soils data show that Corridor E has significantly greater limitations on transmission line development than the northern options. Corridor E crosses significant extents of steep terrain requiring high access, often on unstable or restrictive materials such as talus or shallow bedrock. Construction in these areas would result in severe slope scarring from access road construction, talus slope disturbance, erosion and slope failures. Terrain suitability and the significantly much lower access requirements along the proposed route would have lower impacts on natural resources, making it the preferred alternative.

5. <u>Comment</u>: Less land classified as big game sensitive habitat would be crossed if Corridor E were used. Seventeen miles of big game sensitive habitat would be crossed by Corridor E as opposed to twenty-one miles on the Taft route.

<u>Comment:</u> . . . On a more southern route (E corridor) would be affecting less winter elk, winter range and calving grounds.

<u>Comment</u>: Wildlife impact is greatly reduced by using Corridor E. Corridor E would create a low impact on about sixteen miles and a moderate impact on less than one half mile, whereas the Taft Route would have a low impact on about twenty-one miles and a moderate impact on more than two miles.

<u>Response</u>: The team's evaluation of Corridor E found that this route would have greater impact on wildlife (primarily big game critical winter range) than the northern options. This is based on higher access requirements for E and a greater amount of critical big game range crossed. The evaluation was made using habitat maps from the Deerlodge National Forest, which are refined and more detailed than the small-scale reproductions in the EIS. Based on these maps, approximately 5.8 miles of critical big game range would be crossed by the proposed Taft route, approximately 5.5 miles by Option A', and approximately 10 miles for Corridor E.

6. <u>Comment</u>: Forestry impact would be reduced by using Corridor E. Corridor E crosses about 12 miles of low impact and ten miles of moderate impact land. The Taft route crosses about eight and a half miles of low impact land, but about 12 miles of moderate impact land.

<u>Response</u>: The inventory data for forestry along the three alternatives evaluated for the Maxville local routing alternative are as follows:

|   |             |            | Impact Pote<br>Total |            |
|---|-------------|------------|----------------------|------------|
| Route   | • Moderate  | Low        | Forest               | Non-Forest |
| Preferred route (A)<br>Northern adjustment (A') | 10.5<br>8.3 | 5.6<br>4.2 | 16.1<br>12.5         | 6.6<br>9.9 |
| Corridor E                                      | 13.6        | 11.7       | 25.3                 | 2.1        |

7. <u>Comment</u>: The recreational impact would also be reduced by using Corridor E. Corridor E passes over no areas of moderate impact, where the Taft route crosses over two identified areas of moderate recreational impact.

Response: The final recreation evaluation made for the comparison of the Maxville Local Routing Alternatives indicates that higher impacts would occur along Corridor E even when the dude ranch operation being established east of Maxville is brought into the analysis. (This dude ranch was overlooked in the initial analysis.)

The reasons that Corridor E received a higher impact rating include: crossing close (+200 yards) to undeveloped, high-use camp sites; crossing four popular fishing streams; crossing an undeveloped hunting and elk security area (east end) that is presently used by an outfitter; and the future use expected from the dude ranch. As stated in the response to comment #2, the back country or wild land status of the area is its recreational attraction, and the transmission line would significantly affect this. The alternatives to the north have fewer impacts, some of which are less direct, and the length of the affected recreation attractions is generally less.

8. <u>Comment</u>: The corridor E crosses fewer areas identified as cultural resources. . .

<u>Response</u>: Corridor E actually threatens more significant cultural resources with adverse impact than does the original Taft Plan route, (or the northern alternate). Impacts on historically significant resources would most likely be limited to visual impacts along the Taft route, while the E route threatens significant resources with direct impacts both from construction and from vandalism resulting from improved public access to remote mines, mining remains, cabins, and so on. (See response to comment #2.)

9. Comment: Our interpretation of CEQ rules on NEPA does not warrant the contention of your March 16 letter that BPA "Can make no decision on further studies until the Draft EIS is reviewed and the extensive studies . . . have received the opportunity for public comment." Rather, CEQ mandates that agencies "study, develop, and describe appropriate alternatives to recommend courses of action in any proposal which involves unresolved conflicts." . . . early in the NEPA process. In view of the fact that no alternatives to the Maxville crossing were studied, developed, and described previously, we suggest that you do so immediately. Otherwise, "If a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion." If BPA responds to public comment received prior to publication of the Draft EIS by studying, developing, and describing appropriate alternatives to the Maxville crossing and making that information available for public comment prior to closure of the public comment period, BPA can preclude the necessity of preparing such a revised draft.

<u>Response</u>: The main issues raised above appear to be: 1) when can alternatives be determined and evaluated; 2) a contention that there are no alternatives to the Maxville crossing; 3) if there are no alternatives, then the draft EIS is inadequate and needs to be revised and re-issued.

In response (also see Part II. D. 1 in this volume): 1) Ideally, issues and alternatives are determined early during the scoping process where the bounds and limits of studies are defined. However, modifications, minor variations, or new alternatives may be suggested later in the environmental process (for example, during public and agency review of an environmental statement). These suggestions can often be evaluated between the draft EIS and the final EIS and reported in the latter. If the new suggestions involve significant new circumstances or information relevant to environmental concerns and bearing on the proposed action or its impacts, a supplemental draft EIS may be required. 2) There are indeed alternatives to the Maxville crossing of the Flint Creek Valley. A route paralleling an existing 230-kV transmission line that crosses the valley south of Drummond, and three other routing variations through the Garnet Range are evaluated in the draft EIS. Additional routing variations in the Maxville area have been evaluated and reported on in the final EIS. 3) The deficiency (lack of alternatives) of the draft EIS alluded to in the comment is without basis. The suggestion to look at further routing variations in the Maxville area to alleviate possible impacts on the human environment does have merit. These routing variations are evaluated and reported in the final EIS. BPA is continuing to work with local residents on mitigation including possible line adjustments. (See response to comment #2.)

10. <u>Comment</u>: The socioeconomic report on the Maxville area was not delivered to the BPA until September 23, 1981. Therefore, it could not have been recognized as an impact factor when the decision was being made on either the corridor and route selection or on an alternative route selection comparison. Also the interviews on which the study was based were only being conducted when the Hot Springs-Bell Route comparisons were made in July. This is in direct violation of NEPA regulations.

<u>Response</u>: The socioeconomic analysis was completed before a route comparison analysis was done. However, the final manuscript of the report was not delivered until September 1981. The Mountain West socioeconomic team participated in all route comparisons made by the interdisciplinary team in the summer and fall of 1981. The data documented in Appendix D - "Social and Economic Considerations" were fully presented at these route comparison meetings along with the findings from other resource evaluations. (See Part II. G. 1 for further discussion of NEPA issues, and II. G. 2 for discussions on process and methodology.)

11. <u>Comment</u>: Estimated landowner density for segment 132 was rated as low. So the socioeconomic study, late as it was, was wrong. Once again, this landowner density mistake and the after effects of the economic report indicate mistakes slanted against human and social considerations.

<u>Response</u>: Although 19 residences are within 1/2 mile of segment 132 (now segment 612) near Maxville, this is not a high enough level of landowner density that would allow the whole segment to be called either "moderate" or "high." In fact, moderate or high landowner densities were approached only in a few cases in the entire project study area when the line passed near a large number of residences.

The timing of the delivery of the final manuscript of Appendix D is discussed in the response above.

12. <u>Comment</u>: Despite the potential for socioeconomic impacts such as nealth risks, public annoyance, inconvenience, depreciation of property values, the community of Maxville received a low socioeconomic rating. The people of Maxville and nearby private property owners have been disregarded by the site selection process.

<u>Response</u>: When the socioeconomic impact assessment team conducted its field interviews during July and August 1981, most residents of the Maxville area were unaware of the proposed line and thus did not indicate great concern about its effects. Consequently, the route segments which passed near Maxville were given a "low" alienation rating.

Since the summer of 1981, Maxville and other local residents have become increasingly aware of and concerned about the proposed right-of-way. Their sense of alienation toward the siting process and the potential for alienation, if the line should be sited along the proposed Taft route could now be considered "moderate" or "high." However, this increase in rating would not shift an overall comparison enough, when considered as one of numerous resource rankings, to alter the socioeconomic preference from the Taft route to either the Hot Springs or Plains routes.

13. <u>Comment:</u> We [Granite County Alliance] believe that a route through this corridor ["E"] would be preferable for the following reasons: It would avoid all residences. Any route through this corridor would be more than one half mile from any permanent homes, whereas the Taft route comes closer than one half mile from 18 permanent residences in the Maxville area.

Response: There is no question that the proposed route is closer to more people than a route to the south (in Corridor E). This was a major factor in both the urban-residential and socioeconomic comparison of route options in the Maxville area, as summarized in the response to comment #2. However, the Corridor E does not entirely avoid inhabited areas. There are still six permanent residents within one mile of this location. The issue in determining a route preference involved weighing differences between the route options in the actual socioeconomic and land use impacts, which favored the E corridor, against differences in impact for other resources, which favored the northern routes. The fact that the urban-residential impacts and most socioeconomic effects in Maxville were not rated as highly intense (i.e., the primary effect on urban land use was indirect, visual intrusion) was a factor in the final preference for the proposed route in comparison to serious terrain, wildlife, and other natural system-related effects on the south route.

14. Comment: The name Maxville is not mentioned on any of your EIS maps. Maxville does not show as an urban-residential area on the maps although the urban-residential source map listed identifies Maxville as urban.

<u>Response</u>: The following facts clarify the mapping considerations mentioned: Basic information for the DEIS and Map Volume maps was directly photoprocessed from USGS 502 Series base overlays. No changes were made on these bases for the Maxville area or any other area. A review of these originals shows that several place names appear quite faint. Some of the less-bold place names did not survive the screening/reduction process necessary to make the DEIS maps. A close examination of the DEIS maps will reveal that the name "Maxville" appears to the upper right of the town.

The USGS base map used for the Maxville area (Butte Quadrangle) does not show that Maxville is urban (symbolized by the yellow color). The Montana Department of Community Affairs Land Use Map for Granite County does show Maxville as an "urban and built-up area." This is a broad category which ranges from "high density residential" to "residential structures . . . at an intensity of one or two per acre." We felt the density in Maxville was significantly lower than intensive use urban areas such as parts of Missoula. We therefore placed Maxville in the slightly lower density "dispersed development" category.

The area of Maxville does appear as dispersed development on figure 4.3, Land Use/Land Cover, of the draft EIS. However, due to registration difficulties, the two colors which make up the "dispersed development" color (orange and gray) did not overlap exactly. For this reason, regrettably, all dispersed development areas on this map are difficult to see. The maps are reprinted as part of the final EIS.

15. <u>Comment</u>: It is alarming that the data printout shows 0.0 miles of either urban or dispersed development, despite direct evidence to the contrary. This is evidence that overall, the population in Maxville was never considered in the draft EIS. The data that a community existed within a halr mile was not considered or addressed.

Response: The population of Maxville was considered in the DEIS: The urban/residential analysis concluded that there were no noteworthy impacts on urban-residential land use in this area. As stated elsewhere, proximity to a route is not in itself an indicator of impact. The reasons for a conclusion of "no significant impact" were these: No residences or other developed land are crossed. The data printouts show "0.0" miles of urban land crossed at Maxville because, technically, the right-of-way would not encounter any developed land. In fact, new data items (proximity of the line to communities or residences) were added because the "urban/residential" and "dispersed development" items did not adequately describe line location with respect to developed land use. The closest residence is about 1/5 mile south of the proposed line. Thus, the line would not directly conflict with the use of developed land. The northern edge of the 200-plus platted lots comprising the original town of Maxville is 1/4 mile south of the route. One long, narrow 9-acre lot of undeveloped subdivided land is crossed toward its southern end. Thus, conflicts with future development of presently subdivided land would be minimal, if any. Overall, even though a number of residences was within 1/2 mile of the route, the only effects on urban/residential land use in the town of Maxville would be short-term inconvenience effects from noise, dust and construction equipment, and long-term visual intrusion on a number of residences in the area. An analysis of the site and situation of Maxville showed: 1) that care in placing the line and towers plus existing trees at the highway crossing would allow them to be screened partially from most residents of Maxville and 2) that mitigation measures could be employed successfully to limit these views as well (see Volume I, Chapter II -Mitigation Measures).

16. Comment: We have reservations with regard to the extent of your past meetings and contacts with Maxville residents. From discussions with Maxville residents and area landowners, we are convinced that BPA's efforts to contact people in the area have been almost non-existent. Any evidence to the contrary that you could provide would be of interest to us.

<u>Response</u>: In addition to the extensive advertising of project review meetings, public contact efforts in the Maxville area are documented in Appendix A to the draft EIS.

17. <u>Comment</u>: One time you treat it one way and one time you treat it another. I'm just asking you whether you see this [alternative routes near Maxville] coming up as part of the scoping process or parts of comments period.

<u>Response:</u> Routing comments near Maxville are part of the comment record of the draft EIS. They are responded to in this volume of the final EIS.

18. <u>Comment</u>: In the March 16 letter about the EIS process, you say that with regard to routing alternatives suggested while the Draft EIS is being prepared that the "responsible Federal agency is directed, by regulation, to consider such changes and to report on all results of such study . . . during the comment process: that is during the period of time when the complete Draft EIS is made available for public review throughout the study area and the country." In this regard, we request that you confirm that you are studying or plan to study alternative routings in the Maxville area, and that you will "report on all results of such study" prior to closure of the comment period now scheduled for May 28.

We also suggest that considering the clear mandate of the February 4 Drummond meeting, which was held six weeks prior to completion of the Draft EIS, that studying alternative routings in the Maxville area now and reporting on such study prior to closing of the comment period is in keeping with the basic alternatives-comparison concept of the EIS process. Then comments to both alternatives can be addressed in the Final EIS.

Response: 'The comments and routing suggestions made before and during public review of the draft EIS are evaluated in this volume for Maxville and for other local routing alternatives (see Parts IV. B, IV. E, IV. I and IV. N). The conclusions are reported in the responses to comment #2 of this section.

#### IV. C. DRUMMOND

Comments from the Drummond area have focused on the project's potential impacts near the community and on the rural areas south of town. Issues summarized below of general or study area-wide concern are discussed in Part II - SUBJECTS OF CONTROVERSY or Part III - RESOURCE CONCERNS, as indicated in parenthesis. Those concerns which are not referenced are site-specific concerns, and are treated following this summary.

Near Drummond, residents were most concerned about the proximity of the line to the community, about property devaluation and losses to the local tax base (see Parts II. J and II. K), about the health hazards of working around the line (see Part II. H), and about the line's proximity to the elementary school and the Drummond airport. They also voiced concern about potential interference with TV and radio reception and the nuisance effect of dealing with the line's noise effects. (See Part II. H.) Residents who worked and lived south of Drummond focused their comments on the project's effects on agriculture (see Part III. C). They were concerned about any type of development (such as a transmission line) which would remove agricultural land from production. They were extremely concerned about the project's potential effects on the health and breeding habits of livestock and about the reputations of purebred breeding operations that would have to raise cattle under transmission lines. These individuals expressed their desire to see more research conducted on the subject of health effects and wanted to know about compensation should adverse health effects occur (see Part II. H). Some ranchers and farmers in the area were also concerned about the line's potential interference with irrigation equipment, its potential shock effects through equipment and metal buildings, and its potential to cause soil erosion and weed propagation.

The comments from both Drummond and the area to the south expressed strong concern for residents of Hall and Maxville. However, many of the comments stated that the line should be placed well south of Drummond in the mountains where it could be located on public land away from private homes and ranches. Drummond area residents made other comments which included questions on the need for the line (see Part II. A), the potential for paralleling by future lines (Part II. C), and conversion to direct current (Part II. L). They also complained about a perceived lack of adequate public involvement in the scoping process and in siting the line (see Part II. G. l). And finally, a few comments stated that BPA should give proper consideration to landowners when entering private land for surveying purposes and where making compensation for right-of-way easements (see Part II. J).

General and specific discussions on this subject appear in Chapter IV of Volume I. Other concerns are addressed below.

1. <u>Comment</u>: Also, I would like to comment on the Drummond Airport of which I am caretaker, manager; it is owned and operated by Granite County, and I think we would be opposed to any power line in the proximity of that Drummond Airport for safety reasons.

<u>Response</u>: The only alternative that would be close to the Drummond Airport is one that parallels BPA's existing Hot Springs-Anaconda 230-kV line about one mile to the northeast of the Airport. At this time, the alternative along this location is not the preferred routing.

In any location in the proximity of an airport, BPA submits the details to the Federal Aviation Administration (FAA) for review and comment. FAA recommendations concerning safety and the transmission line are usually adopted by BPA.

2. Comment: Concern for erodibility of soils north of Drummond was expressed.

<u>Response</u>: Soils in the area north of Drummond are recognized as posing restrictions to transmission line construction activities. Of particular concern is the shallow depth to bedrock of some soils. Although access road requirements in this area are generally low to moderate, construction-related

impacts may be locally severe at any site where ripping or blasting of bedrock is required. As stated in Volume I, minimizing erosion is always a concern and construction will only be undertaken if careful road design, erosion controls, and proper construction practices are implemented.

# IV. D. GOLD CREEK

Comments from residents of the Gold Creek area were similar to those from other areas. When these issues are treated generally, under II - SUBJECTS OF CONTROVERSY or III - RESOURCE CONCERNS, references to the relevant parts are shown below in parenthesis.

The Gold Creek comments expressed concern about health effects (see Part II. H) and questioned the sincerity of BPA's public involvement process (see Part II. G.1). However, many of the comments focused on the location of the Garrison Substation and the nature of the Garrison-Spokane Transmission Project's siting process (see Part II. G. 2).

Gold Creek residents were concerned about the traffic-related effects of substation construction, and about the uncertainty surrounding location of the line as it would proceed west from the substation. Generally, the comments expressed a preference that the line go south from the Garrison Substation so that it could take more advantage of public land and avoid private land (see Part II. I).

With regard to the siting process, Gold Creek residents felt that the "segmentation" of the line into two different projects did not allow for consideration of routes other than those through the Garrison Substation and Gold Creek (see Part II. D. 1). Several commentors voiced the concern that the Garrison Substation would serve as a magnet for future transmission lines (see Parts II. C and II. D).

For alternatives that may affect the Gold Creek area, mitigation measures have been proposed to minimize impacts to residents, visual quality, and historic sites in the Gold Creek vicinity. Along segment 101, non-specular conductors and treated towers, particularly at the I-90 crossing, would minimize line visibility to travelers, nearby residents, and visitors seeking possible remnants of the Mullan Road. Direct disturbance of the Mullan road would be avoided should any remnants be found and determined eligible for inclusion on the <u>National Register of Historic Places</u>. Remains of the road will be photographically documented. Possible centerline adjustments may also be considered to minimize impacts in the area.

# IV. E. POTOMAC

Comments from the Potomac area focused primarily on economic, esthetic, and route location issues. When these issues are treated generally, under II - SUBJECTS OF CONTROVERSY, or III - RESOURCE CONCERNS, references to the relevant parts are shown below in parenthesis. Other, more site-specific comments are addressed following this summary.

The economic comments included concerns about revenues foregone because of BPA's tax-exempt status and questions about payment-in-lieu-of-taxes (see Part II. K). Other economic questions were asked about land appraisal and acquisition policies and about right-of-entry for surveying (see Part II. J). A few commentors addressed the need for the project and voiced the opinion that Montana was being forced to pay for a project whose benefits would accrue largely to State of Washington (see Fart II. F).

A few commented on the visual effects of the line if it should pass near Potomac (see Part III. J).

Commentors on route location asked about the status of the Jocko Pass Route (see Part II. B) and about the possibility of a route farther south of Potomac to decrease esthetic impacts in the Potomac area. This alternative route south of Potomac in the Garnet Range is addressed below.

1. <u>Comment</u>: Suggestions were made to adjust the line further south of Potomac (in the mountains between Potomac and Clinton) to avoid visual effects on Potomac residents (see fig. 6).

Response: BPA looked at several routing alternatives in the Potomac area including the one suggested above. A routing option located farther south and farther into the hills than the proposed route segment 71 (formerly segment 113) was located by BPA to reduce the line's visibility (fig. 6). This alternative was labeled segment 72. The interdisciplinary study team examined both options in order to determine a preferred alternative.

The visual analysis showed a very slight preference for segment 72. This is primarily because it is located farther away both from Potomac and from frequently traveled routes. Segment 72 also crosses topography more suitable for screening the line. However, steeper terrain and greater access requirements make 72 more susceptible to highly visible landscape scarring. In contrast, impacts along segment 71 are more mitigable; in addition, the line would be backdropped by trees, which would reduce its visibility for much of its length.

Potential impacts would also be lower along segment 72 for urban/residential and cultural resources. For either option, urban/residential impacts would be few and minor. Segment 71 comes close to a cabin near Ashby Creek and would probably be more visible from Potomac; therefore, segment 72 is slightly preferred. No serious impacts on cultural resources are foreseen for either option. Segment 72 is slightly preferred, however, since 71 encounters more structures of possible historic significance. Refer to table 2 for a comparative data summary for these route options.

For three resource concerns--socioeconomics, geology/soils, and agriculture--no discernable difference in impacts were found for the two options. Socioeconomic impacts, through similar in significance, distinctly different in nature. Segment 72 would introduce a visual intrusion and add more access to the backcountry. Segment 71 would affect the area by adding a new parallel transmission line near (within a half-mile or so) developed and

developing areas. Geology/soils impacts along the two options, though different, are similar in extent. Segment 71 crosses greater lengths of sensitive soils, but impacts associated with steeper slopes and scattered talus along segment 72 do not allow it to be chosen as the preferred option. Since no agricultural land is crossed by either option, they were rated equal for agricultural impacts.

For other resources, there would be greater effects along segment 72 than along segment 71. These include forestry, recreation, vegetation, wildlife, and water resources. Impacts on forestry are greater because of increased clearing requirements and possible interference with logging systems. Recreational use in the area consists of hunting, hiking, and other dispersed use activities. Segment 71 would have slightly less effect on these pursuits. Impacts on vegetation and water resources are more adverse along segment 72 because of steeper slopes and greater access requirements, but the differences are not significant. Wildlife impacts are lower along segment 71 since it requires less access, parallels an existing line for much of its length, and poses less impact to streams.

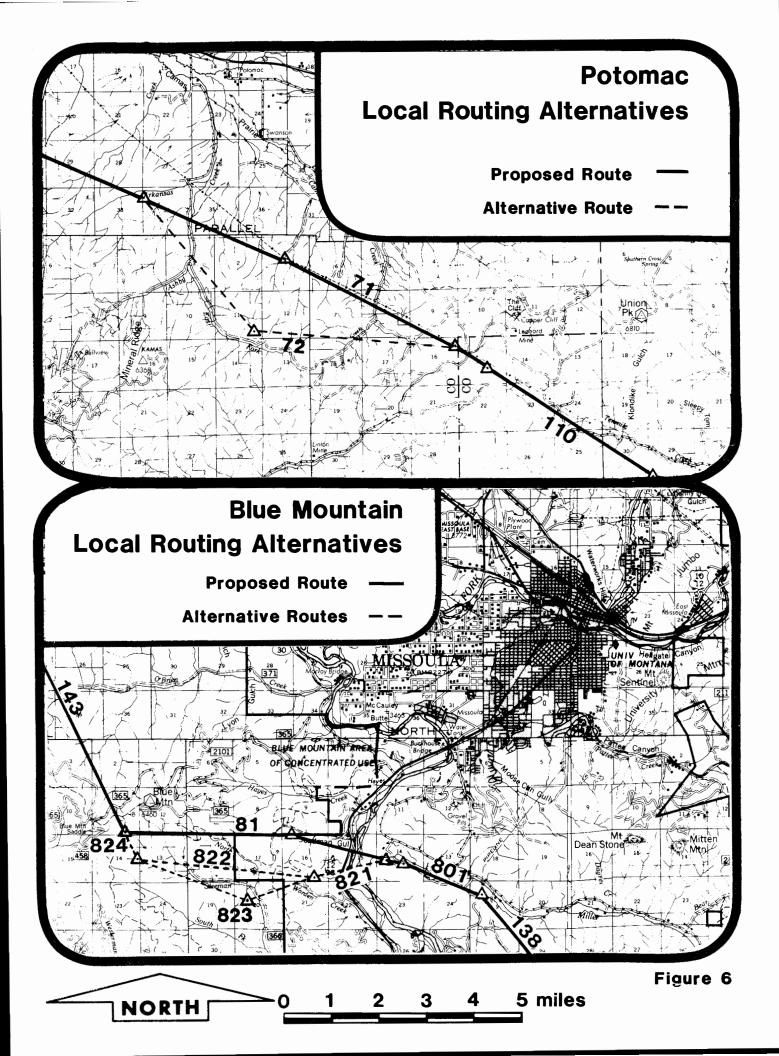
Particularly significant is the increased cost of construction of segment 72. Although segment 72 is almost equivalent in length to segment 71, it would cost approximately 1.5 million dollars more, owing to additional angle towers and access construction.

The overall conclusion was that segment 71, the original route alternative, was the preferred option. Segment 72 was suggested in an attempt to minimize visual impacts; however, the slight improvement in visual quality it offered was not judged significant enough to offset its greatly increased cost and the greater impacts on other resources.

#### IV. F. CLINTON

Although scoping results gave evidence that residents of the Clinton area are concerned about a wide variety of project-related issues and impacts, comments from the area on the draft EIS were limited to the line's potential impacts on residents, farms, and ranches in the Schwartz and Wallace Creek areas. These concerns are answered following this summary. General and specific discussions on this subject appear in Chapter IV of Volume I.

For alternatives in this area, mitigation measures have been proposed to reduce impacts associated with crossing the geographically constrained Clark Fork River Canyon near Clinton. Proposed mitigation includes using improved appearance towers, non-specular conductor, and treated towers to reduce visual impacts. Keeping clearing and permanent access road construction to a minimum and implementing detailed planning to revegetate access roads have been proposed to reduce both visual and natural resource impacts. To avoid land use conflicts, other mitigation measures involve locating the line on sideslopes off the valley floor and coordinating tower siting with private landowners.



1. <u>Comment</u>: This is written to protest the proposed BPA route that may cross near Clinton, Montana. The Schwartz Creek and/or Wallace Creek areas are heavily populated in areas proposed with several ranches as well. The routes would affect 20 families in the Schwartz Creek area alone--an area about a mile square, between the Schwartz Creek Bridge and the Milwaukee tracks. These proposed lines would put two horse ranches out of busines as well as other small agricultural parcels. We are 100 percent against the proposed lines.

Response: Although not part of the proposed Taft plan, segments 127 or 122 in the Clinton area are still part of a potential route. As stated in the DEIS (p. IV-55), segment 127 passes within 1/4 mile of five farm or ranch dwellings, one of which would be adjacent to the right-of-way.

About 12 additional residences located in the valley between the Clark Fork River and the Milwaukee tracks would experience varying degrees of visual impact from the line and inconvenience effects from construction activities. These residences are located 1/4 to one mile from the route. The route over the Clark Fork and Schwartz Creek Valleys crosses primarily pasture land. No direct conflicts with developed land would occur. Impacts on agricultural land would be: 1) removal of small amounts of land out of production under towers; 2) interference with farming practices; 3) possible loss of production due to disturbance during construction (which is compensated for). BPA's experience has been that such impacts on agricultural land are not substantial.

The Wallace Creek location (segment 122) passes within 1/2 mile upslope of approximately five residences located along Wallace Creek before crossing the Clark Fork River just north of Clinton. Primary effects on these residents would be visual, with no direct conflicts with developed land.

# IV. G. ALBERTON/CLARK FORK RIVER

Comments on the Clark Fork Valley near Alberton touched on a wide variety of issues and recommended consideration of several alternative routes. When these issues are treated generally, under Part II - SUBJECTS OF CONTROVERSY or Part III - RESOURCE CONCERNS, references to the relevant sections are shown below in parenthesis. Other, more site-specific comments are addressed following this summary.

Commentors expressed desires to see the line kept away from residential areas, to use existing corridors whenever possible, and to have EIS hearings scheduled for Alberton and Huson (see Parts II. C, II. G, and III. A). Others stated that the line should be sited further away from residential areas to minimize potential health/safety, noise, and TV/radio reception effects (see Part II. H). One commentor expressed concern about property devaluation and stated that compensation should also be made to landowners adjacent to but not in the right-of-way easement (see Part II. J). Another commentor stated that the line would limit future growth in the area by crossing over platted subdivisions.

Several commentors stressed the economic and quality-of-life-related importance of elk populations and voiced concern about the line's potential adverse effects on wildlife (see Parts III. I and III. K).

Some commentors felt that adequate consideration had not been given to visual mitigation measures in the area (see Part II. N), and that hydrology impacts had not been properly identified (see Part III. F).

The responses to comments which follow this summary address the consideration of alternative Clark Fork River crossings. These alternatives were suggested to minimize impacts in the Alberton vicinity. Additional proposed mitigative measures include the possible use of improved appearance towers or darkened towers and non-reflective conductors and reduced clearing to minimize visual impacts.

1. <u>Comment</u>: Several commentors suggested alternate routings to cross the Clark Fork River near Alberton. These routings include: 1) crossing Petty Creek and I-90 three miles west of Alberton and 500 yards south of the eastbound rest stop; 2) crossing the Clark Fork between Tunnel and Eddy Creek; and, 3) coming out of Tank Creek, crossing the Clark Fork west of the Sugan crossing and up Eddy Creek to the ridge north of Alberton.

<u>Response</u>: Several Clark Fork River crossings were studied between the Alberton area and the Ninemile Creek. Private and group meetings were conducted with landowners and concerned citizens to determine the centerline location that would affect the fewest people.

The interdisciplinary team found that the suggested alternative to cross the Clark Fork River three miles west of Alberton (#1 above) was unacceptable from an engineering standpoint. By staying south of the Clark Fork River to the crossing three miles west of Alberton, the transmission line would traverse extremely steep terrain and would cross perpendicular to steep-sided drainages. Very few existing roads could be used through this steep area and an extensive new road system would be required. The sides of the Clark Fork River Valley are comprised of steep, rocky slopes covered with extensive talus. Finding tower sites to cross here would be difficult, if not impossible. Since the entire valley could not be spanned, intermediate spans down the slopes or in the bottom of the valley would create additional site location and access problems.

Suggestion #2 above is approximately the location of segment 144 (see fig. 4.1 in Volume I). The team found this river crossing to be environmentally unacceptable. This routing would conflict with land uses where it crosses the wide Clark Fork valley bottom for two miles in private land ownership. It would pass within 1/2 mile (west) of a subdivided area with several existing homes (Big Horn Ranch Properties). Most of its towers would be in full view of the Big Horn Ranch Properties, travelers along the freeway, and residences along Ninemile Creek. The line would also be exposed on flat terrain with no backdrop to hide towers and would be in direct conflict with land use on the flat, privately owned bottomland.

Another alternative, suggested by residents of Ponderosa Acres, would be between the proposed river crossing (segment 145), and segment 144. This crossing was found inferior for the same reasons as cited above. In addition, it would present more engineering problems and would greatly escalate costs. Compared to the proposed crossing, this alignment is 0.3 miles longer and has tour more angles. Unlike the proposed location where the two railroads, frontage road (old highway), and Interstate 90 are relatively close to the river, these four transportation routes are spread out. In addition, the area north of the Interstate and south of the Clark Fork River is low, marshy, and flooded during high water, making it undesirable for a tower site.

Crossing from the south side of the Interstate and railroad to a point north of the river would require a span of about 2,500 feet. Since both sides are about the same elevation, tall towers would be needed to maintain minimum clearance above the water. The southerly tower would be just over 200 feet tall and the northerly tower in the range of 215-225 feet. In addition, the FAA may require standard marking and lighting on these structures, since this is a heavily used flight corridor.

A fourth river crossing alternative is segment 145. This option has the least environmental impact and is part of the proposed route. The centerline was adjusted south to take more towers, especially an angle tower, out of view of the Big Horn Ranch Properties in Section 34. With this alignment, the cleared right-of-way is at an angle so that it will not be visible from residences. However, parts of approximately three towers, within one mile of the existing and proposed homes, would be visible above the trees. Two towers, both of which would be two or more miles away from the Big Horn Ranch Properties, would also be visible. Other towers between these areas and the towers to the south along Tank Creek would not be visible. The towers would be visible to one proposed resident who wishes to orient his home toward the West. However, this home would be about 2,500 feet away from the nearest tower. The existing houses are further away and face primarily to the south or north. Their occupants would not see the line.

The centerline has also been adjusted to minimize other visual impacts. The residents of Ponderosa Acres in Sections 5, 6, 7, and 8 with views to the north would see five or six towers from a distance of one mile or more. The alignment was moved slightly to the north in Section 31 and 32 to reduce visual impacts on existing and proposed residences in Sections 5 and 6 north of the freeway. This river crossing would need about a 2,400-foot span to cross the highways, railroads, and river. However, the westerly tower is several hundred feet above the river and typical average height structures should provide adequate clearance. Marking the towers for the Federal Aviation Administration is unlikely, although marker balls on the conductor and ground wire might be required. The proposed alignment crosses the least amount of private land (1.2 miles) and is most compatible with proposed land uses in the area.

# IV. H. ROCK CREEK

Commentors on the line's potential effects in the Rock Creek area focused on the importance of Rock Creek as a productive fishery. A few commentors stated that pleasant surroundings were just as important to fishermen as catching fish, and expressed concern about visual effects. Other commentors addressed the potential problem of sedimentation during the construction period. One commentor also felt that these effects would hurt the sectors of the local economy that are dependent on fishing as a tourist attraction (see Part III. I).

#### These concerns are addressed by the comments and responses which follow.

Specific centerline location work has continued on the Rock Creek crossing to determine an alignment that will not be a hazard to the emergency small plane flyway in Rock Creek and still minimize impacts on the natural resources and esthetics of the Blue Ribbon fishing stream. Mitigation of impacts at the Rock Creek crossing is discussed under the response to comment #1. These have been undertaken by joint coordination of BPA, Forest Service, and the Montana State Aeronautics Board.

1. <u>Comment</u>: We do not feel the adverse significance of the visual and sediment impact has been adequately evaluated. The Rock Creek Fishery is among the most nationally recognized and important in Western Montana. Visitors from most states in the U.S. annually visit this stream. Its relatively undeveloped character is symbolic to many visitors of the Rocky Mountain West.

The crossing of Rock Creek by a 500-kV transmission line would violate the visual criteria that established Rock Creek as a Blue Ribbon trout stream. Specifically, the high towers, the suspended line with aircraft warning (e.g., orange balls) and associated access roads would seriously detract from the aesthetic values of the lower canyon. Previous fishermen preference studies have documented that aesthetic and pleasant surroundings are as important to fishermen as catching fish. Most of the Rock Creek fishing activity takes place in the lower canyon and most access by fishermen takes place via the mouth of Rock Creek. Therefore, the fishermen-recreationists' visual impact is disproportionate to the percentage of Rock Creek affected. The Montana Chapter of the American Fisheries Society and many other people oppose the crossing of Rock Creek and the establishment of a corridor through the area.

<u>Response</u>: The proposed centerline in this area has been adjusted in response to concerns about hazards to the emergency flyway. The proposed Taft Route would not parallel Rock Creek, but cross it at an angle about two miles south of the Clark Fork with the conductors spanning well above the creek. The line would span about 3,000 feet across the creek, with the towers located on the side slopes of Rock Creek. Therefore, no clearing of any of the riparian habitat adjacent to Rock Creek is anticipated. New access roads would not be required across the valley bottom of Rock Creek. Access would be put in to each tower site from the upper slopes but would continue down the lower slopes adjacent to Rock Creek. Existing roads on the valley bottom can also be used. There would be visual impact from the conductors above Rock Creek. By curtailing construction and maintenance activities within the canyon, and by employing stringent erosion controls, adverse impacts on earth and water resources, including its value as a Blue Ribbon fishery stream, can be avoided.

The conductor would be non-specular so as not to reflect sunlight, but would probably have orange marker balls to increase visibility to low flying aircraft. The towers would be darkened to blend into the background and raised to minimize clearing.

2. <u>Comment</u>: In addition to this power line, we feel its location is a precedent for additional utilities. The Rock Creek area does not have suitable terrain to accommodate any utilities.

<u>Response</u>: Although BPA always locates transmission lines with the idea of possible future lines paralleling an existing right-of-way, no additional utilities are planned in the near future (10-15 years) for the proposed Garrison-Spokane project. The Rock Creek area is rough terrain but can accommodate several transmission lines within a utility corridor.

## IV. I. LOLO/MILLER CREEK/BLUE MOUNTAIN

Commentors from the Lolo/Miller Creek/Blue Mountain area addressed a wide variety of issues that concerned the project in general and its potential impacts in the local area. Where these issues are treated generally, under Part II - SUBJECTS OF CONTROVERSY or Part III - RESOURCE CONCERNS, references to the relevant section are shown below in parenthesis. Other, more site-specific comments are addressed following this summary.

Several residents questioned the need for the project, given success of recent conservation efforts, reduced load forecasts, and cancellation/delay of three WPPSS nuclear plants (see Part II. A). Other commentors questioned the propriety of holding public meetings in local areas when the issue of BPA's compliance with the Montana State Facility Siting Act had not been resolved (see Part II. G. 2). Many residents were concerned about the long-term health effects of the line (see Part II. H). They asked questions about BPA's responsibility for health effects if they should occur and expressed a desire to see more research conducted on the subject.

Most of the comments on local impacts of the project concerned its potential esthetic effects. Commentors addressed the possibility of visual effects on Highway 93 travellers, on current residents of Missoula, Lolo and Miller Creek, and on potential residents of proposed subdivisions, particularly Rodeo Ranchettes. Concern over these potential visual impacts prompted the Forest Service to suggest other route alternatives in the Blue Mountain area (fig. 7). Three route alternatives were subsequently examined by the interdisciplinary study team, and are discussed in the response to comment #13. Many people expressed support for undergrounding as a mitigation measure in the Bitterroot Valley (see Part II. M). A few stated that if undergrounding were technically feasible, its cost should be borne by Pacific Northwest power consumers. Other commentors expressed concern about the project's land value and land use effects (see Part II. J). They stated that it would remove agricultural land from production (see Part III. C), reduce the attractiveness of local recreation areas (see Part III. D), and adversely affect wildlife, particularly deer, elk, and bald eagles (see Part III. K). It was suggested that interested state agencies should consult with BPA personnel to minimize wildlife impacts in the area. Some commentors objected to line adjustments being considered by BPA, stating that such changes simply shifted the impacts from one group of residents to another. A few commentors expressed opposition to aerial spraying of herbicides on rights-of-way and to possible construction period effects on water resources (see Part III. F).

Several commentors from the Lolo/Miller Creek area asked about the possibility that the Garrison-Spokane line would be paralleled in the future (see Part II. C). And finally, a few people suggested that an alternative route be examined in the area.

Discussion of wildlife impacts and possible route alternatives in the Miller Creek area are presented in the following comment/response section. Additional concerns over property devaluation are also discussed below.

As detailed in Volume I, Chapter II, mitigation measures have been proposed for the Miller Creek/Lolo/Blue Nountain area. Along the first few miles of segment 139, south of Miller Creek, access road construction on unstable slopes will be limited. Where the line crosses the Bitterroot River, a number of measures would minimize effects on esthetic and natural systems resources. Treated towers or towers using improved appearance design would be used, as would non-reflective conductor wires. The line would be built down the south side slope of Miller Creek to decrease visibility of the towers from areas to the north (Missoula) and the south (Lolo). Ground disturbance would be held to a minimum and undercutting of this steep slope would be avoided. Disturbed areas would be reserved immediately after construction. Disturbance would be minimized at the river crossing to avoid siltation effects on the river and possible loss of bald eagle perching sites. Up the Bitterroot Valley's west wall into the Blue Mountain area, selective clearing and minimal access road construction would avoid scarring effects and would increase the ability of the line to be absorbed by the landscape in distant views. In addition, undergrounding of the line at the Bitterroot River crossing was investigated as a mitigation measure but not recommended by the study team (see Part II. M).

1. <u>Comment</u>: Regarding the proposed route through the Missoula area, we believe that the Southern Lolo Route is esthetically ugly, comes in far too close to contact with humans, and would be a liability to home owners of this community.

<u>Response</u>: If this route adversely affected property values in the Missoula area, then it could be considered a financial liability to homeowners in the community. However, studies are conflicting and inconclusive regarding whether property values would be adversely affected. For a more explicit discussion of transmission lines' effects on property values, please see Appendix D: "Social and Economic Considerations," p. 2-17. This issue is also addressed under Part II. J of this Volume. 2. <u>Comment</u>: I own a good ranch just south of Iolo. Our range land east of the Bitterroot River has been cut north to south by power lines and one gas line a distance of about one and three-quarter miles. The open space is burdened with these Montana Power installations. Now, should an alternate line south of Miller Creek be built, it appears that our ranch will be once more cut by BPA lines east to west over our northern-most piece of land in North Fork Davis Creek. I am reliably informed that BPA has already commenced condemnation and preliminary construction work from Garrison west. It therefore appears that the decision is made, that our thoughts or protests are useless.

Response: As indicated above, the Taft Plan would cross the open space on the ranch. Although this route is proposed, no decision on a proposed routing has been made. Right-of-way acquisition will not begin on the Garrison-Spokane line until after the Record of Decision in the spring of 1983. However, land acquisition proceedings (in some cases, condemnation proceedings) have begun on the Townsend-Garrison line east of Garrison Substation.

3. <u>Comment</u>: Segments 139 and 142 pass in close proximity to the boundaries of the Iolo Trail National Historic Landmark, and segment 5 passes near glacial Lake Missoula National Natural Landmark. These sites have been designated for their outstanding historic or natural qualities. Although no statutory protection has been given to these areas, every effort should be made to avoid any adverse impacts. If the final route of the transmission line includes these segments, we recommend that visual impacts on these areas be reduced as much as possible.

<u>Response</u>: The crossing of the Lolo Trail (segments 139 and 142) is in an area that has already been modified by Highway 93 and the railroad. Visual impacts are further reduced by selecting a route of short visual duration to travelers, raising tower heights to reduce tree clearing, or changing tower design if the situation warrants. The glacial Lake Missoula National Natural Landmark is over four miles away from route alternatives and on the other side of a divide from segment 5.

4. <u>Comment</u>: The first miles of segment 139 would be visible from Loto and Southwest Missoula and . . . the Miller Creek residential area. Three miles of towers will be seen going uphill west of the Bitterroot river. BPA's orange marker high on the hill north of Cahoot Canyon can be seen from Southwest Missoula and Lolo and beyone. If the tower is placed there, it will be skylighted for miles. Mitigation, again, is to underground.

Response: BPA recognizes the high visibility of this line to residents of Lolo, Miller Creek and Southwest Missoula. Adjustments have been made to reduce the visibility zone as much as possible. Special mitigation measures such as tower darkening, reduced clearing and possibly the use of improved appearance structures will be used. Undergrounding is not proposed. (See II. M for a more detailed discussion of undergrounding.)

5. <u>Comment</u>: We have been told that the reason for the placement in the Rodeo Ranchettes area is out of consideration for Lolo residents. I drove to Lolo, . . . and saw that the route places the power line in direct view of Lolo. The placement on the north slope instead of the south slope of Cahoot Canyon puts it out of their line of sight up until it exits the mouth of the Cahoot Canyon . . . we expect no objection to this small adjustment. [Moving it to north slope.]

<u>Response</u>: The placement of the line in the Miller Creek Valley (Rodeo Ranchette area) is an effort to decrease the zone of visibility as much as possible by taking advantage of the topography. Direct impacts on some viewers will be unavoidable. However, the current alignment takes best advantage of the terrain for screening and has the least overall impact.

6. <u>Comment</u>: In Miller Creek the route passes within one-half mile of a small residential development of 85 homes, plus approximately six more across the valley floor. The line also crosses through the middle of a planned 225 unit subdivision that is already approved. The line will force lots back down into the valley floor, which had been set aside as a buffer zone.

<u>Response</u>: As indicated in the draft EIS (Chapter IV), visual effects on land use in the existing residential developments would be minimal due to landform screening. The EIS mentions that the six additional residences along the north edge of the valley floor will have direct views of the line from less than 1/2 mile.

The draft EIS (p. IV-55) also discusses the fact that the Taft route crosses part of the proposed Rodeo Ranchette planned unit development. Based on maps provided to Missoula County with the zoning application, the line would cross approximately nine lots, all in Phase II. The line would conflict with the development of these particular lots, and would intrude visually on adjacent portions of the development.

Miller Creek is one of the few locations in the Missoula area where a transmission line can be located without direct impact on developed land. The proposed route was located to disrupt as little as possible the future development of this subdivision, while also minimizing effects on adjacent developed areas. Locating either to the south (towards Lolo) or to the north (toward the South Missoula hills) would create worse visual impacts and possible direct conflicts with existing residences and developed land. Since the proposed planned unit development is in the planning stages and only one of six planned phases is directly crossed, it would be possible to revise the development plans. This would be a less serious impact than the direct crossing of existing developed land uses. Since the route crosses lots in the northern part of the development which are on or adjacent to the valley floor already, there is no evidence that the line would force lots onto the valley floor. It appears that there are numerous suitable locations upslope for relocating affected phases of the development.

7. <u>Comment</u>: I would recommend that the Miller Peak Route be used. Also, in talking to the landowner involved, he would cooperate with access that would

locked at all times, easing the traffic involved to your line. The route all also have less impact on lifestyles involved and be less of an eyesore. would cross less productive forest land and disturb less wildlife habitat.

short, the improvement of existing roads and building of new would be far so of a headache than going the easy route with much more exposure to indalism and disturbance of a very tender and aesthetic area.

<u>Response</u>: The "Miller Peak" routing option was studied and found feasible for the following reasons: 1) if the alignment were put on the outhwest slopes of Miller Peak, the transmission line would be visible to a eat part of the Bitterroot Valley; 2) the line would be very near an disting residence; and 3) although a route was developed to the north which ould avoid visual impact on the Bitterroot Valley and the residence, upon eld analysis the route was found to be unbuildable because no adequate lling or stringing sites were available.

<u>Comment</u>: At the present time, according to your maps, you have two routes osen. One is at the head of Miller Creek and the other is on the north outh] side of Miller Peak. I understand that it is more convenient to make e of existing roads in the areas chosen. But I feel that there are several tfalls to this thinking that should be considered on which I will aborate. Concerning the two routes in the Miller Creek-Miller Peak area ogments 137 and 128) . . . the headwaters of Miller Creek (segment 137) ald be disturbed by your construction and heavy machinery and would affect e entire drainage. This area is very tender and should not be disturbed. is also used by wildlife such as deer and moose for fawning grounds. ouse also inhabit this area for nesting. Fish spawn there and are fed into he entire length of Miller Creek.

<u>Response</u>: As discussed in Volume I, the major impact on wildlife from ansmission lines is from access roads. Consequently, it is usually better use existing roads whenever possible. Disturbance to deer fawning and ose calving grounds may result from construction activities. However, instruction activities would only result in short-term impacts.

minimize or reduce the overall disturbance along this area, the following ligation measures will be used during and after construction: 1) instruction will be limited during periods of adverse weather or ground onditions; 2) disturbed areas will be seeded with quick-growing grass species sily adaptable to the site; and 3) erosion control measures, such as ainage structures and low-gradient road cuts, will be used in fragile and insitive areas.

<u>Comment</u>: You have two routes chosen. One is at the head of Miller Creek egment 137) and the other is on the north [south] side of Miller Peak egment 128). The route at the head of Miller Creek and along the Holloman ddle Road crosses very productive and well-managed forest land, especially om Miller Creek to the Davis Point area. The other route would cause fewer fects. <u>Response</u>: In the Miller Creek-Miller Peak area, the data shows that the southerly route (Miller Creek--the environmentally preferred route) has less impact on high, moderate, and low productivity forest lands.

|                          | Productivity Impact Potential |          |         |            |  |  |  |  |  |  |  |
|--------------------------|-------------------------------|----------|---------|------------|--|--|--|--|--|--|--|
| Route                    | High                          | Moderate | Low     | Non-forest |  |  |  |  |  |  |  |
|                          |                               | Miles    | Crossed |            |  |  |  |  |  |  |  |
| Miller Creek (southerly) | 0.1                           | 7.4      | •8      | .9         |  |  |  |  |  |  |  |
| Miller Peak (northerly)  | 1.6                           | 8.3      | 1.7     | •8         |  |  |  |  |  |  |  |

10. <u>Comment</u>: The area of the head of Miller Creek is very scenic, has a lot of esthetic value, and is used very heavily by the residents of the Miller Creek drainage as a recreation area.

<u>Response</u>: The interdisciplinary team's route impact analysis and rankings demonstrated that recreational use and value of the two routings is essentially the same, with no preference for either. The southern route option was selected as environmentally preferred by considering recreation in combination with other resources such as socioeconomics, forestry, wildlife, vegetation, water, geology/soils, esthetics, and engineering/site development. This analysis is summarized in Figure 19, Garrison-Missoula Comparison Workshop, in Attachment 3, Appendix A, "Methodology."

11. <u>Comment</u>: Let me try to explain the difficult position in which BPA proposes to place Miller Creek residents: we cannot, in the depressed real estate market which exists, sell our homes and move. It we could expect a sale at all, it would only be at great financial loss; a loss which I, for one, am not in a position to be able to sustain.

<u>Response</u>: For a more complete discussion of research on transmission line effects on land values, please see page 2-17 of Appendix D, "Social and Economic Considerations," and Part II. J of this volume. As discussed there, the research on this subject has contradictory results about whether and in what magnitude transmission lines affect property values. (To date, no studies have shown any appreciable effect on residential property value at distances greater than 500 feet trom the line.)

12. <u>Comment</u>: The lines in the Miller Creek/Bitterroot River area would cross nearby bald eagle populations and be at the height they tend to soar. We are very concerned about collisions with the lines.

<u>Response</u>: In compliance with the Endangered Species Act, Bonneville Power Administration (BPA) prepared a biological assessment on the effect of the proposed transmission line on the bald eagle. This assessment evaluated the potential for bald eagle collisions. Review of the literature has shown that bald eagles do occasionally collide with power lines. However, most collisions tend to be with low-voltage lines. Bald eagle collisions with high voltage transmission lines (such as the proposed facility) are not considered a major problem. This is generally attributed to the high visual acuity of eagles, to their good flight maneuverability, and to the large size of transmission line conductors (16-inch bundles for the proposed line) which make them more visible. Willdan Associates (1982) conducted a bird collision study of a 500-kV transmission line crossing of the Columbia River. Their observations suggested that bald eagles had no aversion to flying across the line, and they recorded no collisions or "near collisions." They concluded that the line had no negative impact on bald eagles.

Based on the evidence above, BPA does not feel that the proposed line will pose a serious collision hazard to bald eagles.

13. <u>Comment</u>: Visual impacts on Missoula, Lolo, and nearby areas could be mitigated by relocation of the line in the Blue Mountain area.

<u>Response</u>: The interdisciplinary team examined three route alternatives to the original route in the Blue Mountain area. These alternatives include segment 81, a readjustment of the originally proposed route running through Deadman Gulch, and two alternatives which pass through the Sleeman Creek area to the south. Segment 823, of the southernmost alternative (segments 821, 823, and 824), is located on the north-facing slope of Sleeman Creek. The remaining alternative consists of segments 821, 822, and 824, with segment 822 located along Sleeman Creek's south-facing slope.

The study team's consensus was that the northernmost alternative using segment 81 was a clear and highly preferred choice. It ranked best for all resource topics and all of the concerns that were designated as driving factors (wildlife, geology/soils, esthetics, and engineering/site development). No clear preference between the southern alternatives could be made. It was noted however, that the alternative using segment 822 favored human and land use concerns while the alternative incorporating 823 reduced impacts on natural resources. (Also see the data summary, table 2.)

Segment 81 would intrude less on developed areas and would affect fewer residences than the southern options. It would cross less private land, (other than corporate holdings) and affect fewer landowners. The southernmost route was the worst for both these resources.

Esthetic impacts would also be lower along segment 81, assuming that proper mitigation is implemented (see last paragraph of this summary). The line would be more compatible with the landforms and impacts would be more easily mitigated here than along the other alternatives. Construction of the line from Miller Creek to meet either of the southern alternatives would force locating an angle tower farther out into the valley, thereby making either of those lines more visible to travelers northbound on Highway 93. The small narrow drainages encountered by the southern routes are visually incompatible with the large towers needed for this project. In addition, steep slopes, especially along segment 822, and access requirements would produce highly visible road cuts and construction scars.

The natural resource concerns all favored segment 81. It avoids critical big game winter range, whereas segment 822 cuts through the last remaining critical winter range in this vicinity: It crosses better terrain, whereas the southern options encounter slopes in excess of 70 percent, shallow soils, and rock outcrops and would disturb the least vegetation.

Segment 81 is preferred because it would have a lower intensity of forest management impacts. The southernmost alternative would cause significant impacts from clearing in an area sensitive to disruption. Agricultural land located on the valley bottoms of Miller Creek and the Bitterroot River would be affected least by segment 81. Either southern option would require placement of an angle tower farther out in the valley, thereby causing greater agricultural inconvenience and construction-period impacts.

Segment 81 is highly preferred from an engineering viewpoint: It presents fewer engineering problems and would be significantly less expensive to build than the other options because of fewer angles and less access needed.

The consideration of alternative alignments (summarized above) was one of the proposed mitigation measures for the Blue Mountain area. Additional measures include use of non-specular conductor and treated towers to minimize visual impacts. The use of taller towers is also being considered to minimize clearing and its associated visual impacts. These mitigation measures would increase the line's potential to be absorbed by the landscape. Proposed minimization of access road construction and ground disturbances would also reduce visual and associated environmental impacts.

14. <u>Comment</u>: In section II, page 31, moving segment 142 further south is discussed. This might reduce the impact a small amount for one part of the population, but would increase the impact on another portion. If this is considered, hearings should be held to allow public comment.

<u>Response</u>: The alignment was shifted 1/2 mile south of the original route south of Blue Mountain. (This new alignment was called segment 81 and is discussed in the previous response.) This change was a minor adjustment designed to put the line further away from the Blue Mountain Lookout tower without affecting other developed areas and without increasing impacts on residences near the original 142 route (see segments 81 and 802, fig. 6).

15. Comment: For about the past 16 years I have leased for livestock grazing section 16, T12N, R2OW, owned by the State of Montana, and the adjoining section 21 to the south, owned by Champion Int. Timberlands. BPA is apparently currently considering having a 500-kV power line pass through the north edge of said section 16, and south of Deadman Gulch. Moving the power line south of the bottom of Deadman Gulch to open areas in section 16 would have an adverse environmental impact on a considerable number of wildlife. This area in section 16 and all of section 21 comprises the winter range of up to 50 head of elk and the year round habitat of about 30 head of deer and several bald eagles. On April 19 last from my residence I counted 27 head of elk and on this date, April 20, 43 head of elk, and 24 deer grazing this area within sight of motorists driving on Highway 93 south from Lolo to Missoula. This is also calving area for elk cows during May each year. There are elk in this area from November through May each year, with larger numbers during the winter and spring months.

<u>Comment</u>: The elk's relatively small winter range has been further restricted during the past four years by a subdivision and construction in

Sleeman Creek. It is respectfully suggested that interested state agencies may wish to consult with BPA in an effort to prevent severe adverse effect of the power line on this progressively diminishing winter range, and the wildlife in this area.

<u>Comment</u>: There are also eagles, toxes and numerous wildlife which we have always tried to protect from human invasion. It would seem unreasonable to install a huge power line that would be detrimental to this pristine area.

<u>Comment</u>: . . instead of observing elk, deer, and other wildlife on the Bald Hills of the southern portion of Section 16 during the winter and spring from four lane highway 93 south from Lolo to Missoula, the thousands of daily motorists using this highway would be treated to a huge power line with 175-foot steel towers.

<u>Response</u>: As summarized in response #13, BPA has evaluated several routing alternatives through the Sleeman, Deadman, and Worden Gulch area, and is aware of the importance of this area to wildlife, particularly to big game which is reflected in the wildlife analysis for this routing alternative. (Wildlife impacts in general are discussed in Volume I, Chapter IV.) The Deadman Gulch alternative would have the least impact on critical big game winter areas compared to the southern alternatives (Sleeman or Worden Gulch), as the route is confined largely to north-facing slopes. BPA has consulted with the Forest Service and with Montana Department of Fish, Wildlife, and Parks, and they concur with BPA's finding that the Deadman Gulch alternative would have the least impact on wildlife. BPA will consult further with these agencies in development of mitigation measures if this route should be selected.

On the proposed aligment, three or four towers would be visible to northbound travelers. This location would not preclude wildlife from continuing to use this area (see <u>Biological</u> and <u>Electrical Effects</u> and <u>Wildlife</u> discussions, Chapter IV) but it may detract from the visual experience of passing motorists.

16. Comment: Under social considerations: segments 138 and 139 [Miller Creek area] have high alienation in regards to the proposed route even though the EIS doesn't recognize it.

<u>Response</u>: On page 4-24 of Appendix D, "Social and Economic Considerations," segments 138 and 139 are assigned "considerable" or "high" levels of alienation. The alienation level on segments 138 and 139 was considered high throughout the route evaluation process. The text of Volume I has been changed to reflect this data.

#### IV. J. MISSOULA

Residents of the Missoula area share interests in a variety of study-area-wide issues and voice strong concerns about site-specific issues as well. The comments received were predominantly on subjects of controversy and resource concerns related to the Missoula Valley in general. The most frequently

mentioned issues included health and safety, undergrounding, esthetic effects, property values, need for the line, and revenues foregone because of BPA's tax-exempt status.

Such issues are treated generally elsewhere (i.e. Part II - SUBJECTS OF CONTROVERSY or Part III - RESOURCE CONCERNS), but summarized here with references to the relevant section in parenthesis. The site-specific concerns received were focused enough to identify three distinct geographic areas of concern in the Missoula area--the Rattlesnake National Recreation Area, the Lolo/Miller Creek/Blue Mountain areas, and the Rattlesnake/Grant/Butler Creeks areas. The specific comments and responses to them are discussed in these parts rather than here, although two site-specific comments are addressed following this summary.

Nevertheless, Missoula itself is a place of special concern. It is located centrally in the study area, and would be affected to some degree no matter which alternative is chosen for this project. It has the largest concentration of people in the region. Many residents are interested and active in community affairs and regional issues, a fact reflected in the statistics on comments received for the Garrison-Spokane EIS. As discussed in the Introduction to this Volume and shown in figure 2, Missoula County accounted for almost 2,000 comments or about 47% of the total number of comments received on the project.

Many commentors on health and safety cited results of studies showing that long-term health effects could exist and stressed the need for more research on the subject (see Part II. H). Esthetic concerns focused on impacts that would be felt by local residents every day and the overall feeling that a transmission line would detract from the beauty of the Montana environment (see Part III. J). Many of these comments expressed support for undergrounding the line near Missoula (see Part II. M) and for keeping it as far away from people and residents as possible (see Part III. A).

Many commentors questioned the need for the line, citing concerns about transmitting power to an area that was not completing its own energy facilities (WPPSS) (see Part II. A). Others expressed concern about plans for additional transmission lines and the possibility that they might parallel the Garrison-Spokane Project (see Part II. C).

Several people addressed the studies and methodology used in preparing the EIS (see Part II. G. 2). Specific areas of concern included the health and safety studies (see Part II. H), the socieoeconomic interview process (see Part III. I), the accuracy of geology and soils data (see Part III. G), the segmentation of the Townsend-Garrison-Spokane line into two projects (see Part II. D), and the need for review by the Montana State Board of Natural Resources and Conservation (see Part II. D).

Finally, several commentors from the Missoula area addressed the line's potential effects on property values and the county's tax base (see Part II. J). An interrelated concern was the revenues that would be foregone because portions of the line would be built by BPA, a tax-exempt agency, and not by Montana Power Company, as had originally been planned (see Part II. K).

1. <u>Comment</u>: First, the BPA has ignored the visual effect that a line through the existing corridor would have on the entire northern vista of Missoula. It has considered the visual impact in the vicinity of the line, but has ignored the wider perspective.

<u>Comment</u>: Crossing the Rattlesnake Valley and the northern foothills of the Missoula Valley would destroy the entire northern vista from the city and be visible to tens of thousands of residences and people. This is not reflected on the visual alterations corridor impact map.

<u>Response</u>: Viewer sensitivity and viewer exposure maps in Appendix C (map volume) show this segment (117) to be in a high impact zone. The visual alteration map does not reflect a high impact because this map combines changes to landscape quality with the capability of the landscape to absorb a transmission line. Although the landscape here could absorb the line without extensive scarring from access roads and/or clearing, it still would be a significant impact because it would be visible to so many people residing in Missoula. This information has been added to the final EIS (Volume I).

2. <u>Comment</u>: The growth of Missoula toward the south should be considered as an important factor when discussing urban residential impacts.

<u>Response</u>: The EIS recognizes that a line may have effects on future residences or developments. The EIS states (p. IV-55) that there would be visual intrusion on homes which may be built south of Missoula. For the reasons discussed above, however, locating the line in this area should not be a deterrent to Missoula's continued southward growth.

3. <u>Comment</u>: Another example of the unreality of the social evaluation process can be found on pages IV-25 and IV-75. Here the alienation level for the Ninemile Valley area is given as "moderate." In contrast, the Rattlesnake Valley crossing is given an alienation level of "considerable." This alienation significance level for the Ninemile Valley area should be changed to considerable. Although we have controlled any public display of anger, the citizen comments, questions, and statements at the scoping sessions, meetings conducted by Senator Baucus, or the DEIS review meeting, could haraly be termed "moderate" alienation. Local anger at the WPPSS fiasco has in itself generated a "considerable" level of alienation. Anyone who attended the Missoula Electric Cooperative annual meeting would attest to that fact. Comments such as "if they build them, we'll knock them down" are not made by people "moderately" alienated.

Response: Although individuals in the Ninemile and Rattlesnake valleys may exhibit similar high levels of alienation toward the proposed project, there are two differences in overall alienation between the two valleys. First, the number of people who would be affected by the line is significantly greater in the Rattlesnake Valley. Second, the upper end of the Rattlesnake Valley, by virtue of its designation as a National Recreation Area, would inspire significant opposition from local, regional, and national interests. The socioeconomic team felt that alienation in the Rattlesnake Valley should be called "nigh" while alienation in the Ninemile area should be called

"moderate" in order to reflect this difference. The significance of alienation (high, moderate, low) was a descriptive term in the socioeconomic ranking process, but all alienation areas were given equal weight.

#### IV. K. RATTLESNAKE NATIONAL RECREATION AREA

Commentors on the Rattlesnake NRA addressed a wide range of issues. Where these issues are treated generally under Part II - SUBJECTS OF CONTROVERSY or Part III - RESOURCE CONCERNS, references to the relevant section are shown in the summary below in parenthesis. Other, more site-specific comments are addressed following this summary.

Several commentors, using petitions, stated that the proposed transmission line would destroy the recreational value of this prime and heavily used area (see Part III. D). Other individual commentors stated that a transmission line would conflict with Federal mandates to protect the resources for which a National Recreation area is recognized and that the draft EIS ignored available research on the flora, fauna, and recreational patterns in the Rattlesnake NRA. Many commentors felt that because of these inadequacies, the case against any route through the NRA is stronger than that stated in the EIS (see Part II. G).

Many commentors on the line's visual effects stated that a cleared right-of-way and tower would destroy the natural values of the area (see Part III. J). Other commentors stated that road and right-of-way construction would disturb sensitive soils and vegetative cover, and also lead to deterioration of water quality and local municipal water supplies (see Parts III. F and III. L). A few stated the lines would hinder aerial fire suppression and lead to more man-caused fires (see Part III. B). One commentor stated that the line would reduce the value of the NRA as an educational area.

1. <u>Comment</u>: Because problem soils are crossed [in the Rattlesnake NRA], sedimentation from construction, clearing and road building will endanger Missoula municipal water supply.

<u>Comment</u>: Concern was expressed for the impacts on wildlife in the Rattlesnake National Recreation Area, especially on elk and deer winter range.

<u>Comment</u>: Concerns were expressed that a routing through the Rattlesnake National Recreation Area would so severely impact the natural values (resources and landscapes) that the recreation value would be destroyed in the portion of the NRA that receives the most use. There was also a concern that not enough attention was paid to available data on use and as a result the intensity and magnitude of the impact on recreation was understated in the analysis.

<u>Comment:</u> Friends of Rattlesnake [F.O.R.] opposes the route alternative that would pass through the Rattlesnake National Recreation Area for these reasons:

This route would violate both the intent of Congress and mandate of the BPA. In the Rattlesnake National Recreation Area and Wilderness Act of 1980, Congress finds that the lands of the NRA "have high value for municipal watershed, recreation, wildlife habitat, and ecological and educational purposes." The Act declares it to be the policy of Congress to promote the watershed, recreational, wildlife and educational values of the NRA lands.

It is BPA's mandate, as stated in the Pacific Northwest Electric Power Planning and Conservation Act, "to protect, mitigate and enhance the fish and wildlife" of the Columbia River and its tributaries. These congressional findings and policies, as well as the BPA mandate, are not compatible with the construction of a high voltage power line through the Rattlesnake Recreation Area.

The DEIS recognizes repeatedly (pp. III-2, IV-36, IV-85) that the impacts of a power line would not be consistent and compatible with the legally defined purpose of NRA, "protecting it against non-recreational development" (p. III-2). But the DEIS reasons that, since lines are not specifically prohibited by law, such a line would probably be allowed. This conclusion is clearly in conflict with the findings of Congress as stated in the Rattlesnake NRA and Wilderness Act and with the uses that the act is intended to preserve and to promote. For it would be compelled to seek the protection of the courts to safeguard the intent of the Rattlesnake NRA and Wilderness Act and of the uses specified therein. Even the limited and partially flawed findings of the BPA regarding the impact of a power line on the NRA suffice to show that the power line's impact would be devastating to the "high value for municipal watershed, recreation, wildlife habitat, and ecological and educational purposes" which the act is designed to protect.

<u>Response</u>: Segment 114 across the Rattlesnake National Recreation Area was identified as an alternative to avoid the dense residential area in lower Rattlesnake Creek. The DEIS discussed the serious impacts that would occur in the recreation area, not only on the recreation experience, but also in terms of the visual intrusion, disruption of key big game habitat, and increased potential for sedimentation that would occur. However, at the time of the original analysis and route rankings (see Appendix A, "Methodology") the interdisciplinary team could not make a clear preference between this route and the southerly option (segments 115, 116) through the residential area. This lack of resolution led to a decision to carry both routes through the environmental review process for public comment.

The volume and character of public comment as reflected in the above material reinforced the significance of impacts of building a line here and led to further discussion among the team and consultation among BPA, the Forest Service, the Bureau of Land Management, and the State of Montana. As a result, segment 114 through the Rattlesnake NRA has been eliminated from the preferred routes for the Hot Springs and Plains plans.

IV. L. NORTH MISSOULA (GRAWT/BUTLER/RATTLESNAKE CREEKS)

When these issues are treated generally under Part II - SUBJECTS OF CONTROVERSY or Part III - RESOURCE CONCERNS, references to the relevant section are shown below in parenthesis. Other, more site-specific comments are addressed following this summary.

Commentors from the area north of Missoula stated that the project was undesirable and focused on its proximity to residences (see Part III. A), potential for paralleling (see Part II. C), construction-period disruption to residences (see Part III. G), visual disturbance to people entering the Rattlesnake NRA (see Part III. J), noise pollution (see Part II. H), and disturbance to wildlife from people who would enter the area on new access roads (see Part III. K). Individual commentors also expressed concern about the uncertainty which surrounds the line's potential long-term health effects (see Part II. H). They were also concerned about residential property devaluation (see Part II. J), potential hindrance of fire suppression (see Part III. B), and visual effects on local residences and on the northern vista from Missoula (see discussion below).

Comments on the less developed Grant and Butler Creek areas addressed many of the above issues, but focused on visual and property value effects and their consequences for future residential development in the two valleys. The commentors noted the rapid rate at which both valleys are being subdivided and stated that a transmission line would impair this development and reduce land use flexibility in the area. One petition stated that in the future as many as 2,000 homes in Butler and Grant Creek could be affected by the lines.

Proposed mitigation measures for alternatives in this area included consideration of undergrounding the line in the Rattlesnake Creek area. This measure is not proposed, however (see Part II. M). To help reduce visual intrusion to residential areas (Rattlesnake area, segments 115, 116; Grant and Butler Creeks, segment 117), the use of treated towers and non-specular conductor have been recommended. Both the existing 230-kV line and a short portion of the proposed line near the Montana Power Company Rattlesnake Substation would be rerouted from the existing right-of-way to avoid direct conflicts where residences and a neighborhood park have encroached on the present right-of-way. The recommended departure from paralleling the existing line for a short distance near the Lincolnwood Subdivision would also implement the use of improved appearance towers. In addition, due to the presence of sensitive soil materials in the area, stringent erosion controls and construction practices would be employed.

1. <u>Comment</u>: The route across the Rattlesnake Valley would have a devastating effect on existing residences in densely settled areas and would have adverse effects on thousands of homes in future subdivisions. BPA did not consider this sufficiently.

Response: Volume I describes the effects on existing residential development in the Rattlesnake, Butler and Grant Creek areas as being intense and significant (Chapter IV). These effects are primarily visual intrusion

and inconvenience during construction. This route would occupy an existing right-of-way and thus would not directly conflict with any land intended for development. The urban-residential analysis differentiated between the types of impacts which would occur in situations: 1) where a new transmission line is built near existing developments; and 2) where future development may occur adjacent to or in the vicinity of the by-then existing line. While an additional line might reduce the desirability of settling in these areas for some, it is also true that people do locate adjacent to transmission lines. In the case of future development, the effects were not considered intense or significant because the line would be an existing part of the setting. BPA's experience with similar lines has been that subdivisions are commonly located up to the right-of-way boundaries.

#### IV. M. NINEMILE VALLEY/FRENCHTOWN

Residents of the Ninemile Valley and the Frenchtown area echoed study-areawide concerns about the Garrison-Spokane Transmission Project as a whole and focused on specific issues in their area. Where these issues are treated generally under Part II - SUBJECTS OF CONTROVERSY or Part III - RESOURCE CONCERNS, references to the relevant section are shown in the summary below in parenthesis. Other, more site-specific comments are addressed following this summary.

With regard to the project, commentors reflected concern about how the project's cost would affect local ratepayers (see Part II. L. 2), about the overall need for the line (see Part II. A), and about the decisionmaking process that would be used to select a route for construction (see Part II. G. 2). A few commentors also expressed concern about future paralleling by additional lines (see Part II. C), and one commentor stated that the line should be undergrounded if it is built in the Ninemile area (see Part II. M).

Many comments on the line's potential effects in the Ninemile/Frenchtown area portrayed the small town/rural values of the area and stated that a transmission line would have severe adverse effects on the local quality of life (see Part III. I). Specific concerns included the project's proximity to people and residences and visual effects of the towers and right-of-way (see Part III. J and discussion below). The comments also expressed concern about property devaluation and a consequent reduction in tax base (see Parts II. J and II. K), short-and long-term health hazards (see Part III. H), and potential effects on local residents' TV/radio reception. Finally, a few comments expressed concern about effects on livestock and wildlife (see Parts II. H and III. K) and hindrance of aerial fire suppression techniques (see Part III. B).

Several commentors expressed a desire to see the line constructed by helicopter if it must be built above ground. One asked that BPA notify people living near each proposed alignment, and another asked what alternatives local residents could pursue to fight against the project (see Part II. G). Another stated the alienation level of Ninemile residents is "considerable," not "moderate" as indicated in the draft EIS and Appendix D (see discussion below).

As discussed in Chapter II of Volume I, proposed mitigation for alternatives on the east side of the Ninemile Valley (segments 1 and 6) includes the use of non-specular conductor, treated towers, and selective clearing for access and right-of-way. These measures would reduce visual intrusion for residents, travelers on I-90, and viewers at historic sites such as the Ninemile Ranger Station. Adequate erosion controls will also be implemented to avoid impacts associated with sensitive soils.

1. <u>Comment</u>: These power lines would change the whole appearance of the land [in Frenchtown, Ninemile and Sixmile areas] and make way for new development.

<u>Response</u>: The project would cause changes to the land in this area. The routes would pass near many areas which have been undergoing residential development during the past several years, such as the Sixmile, Mill, and Houle-Roman Creek areas. As this development has occurred prior to this transmission line proposal, it likely would continue, except where the routes might conflict with the development of undeveloped subdivided land (see Volume I, ChapterIV).

The transmission line takes advantage or landform and vegetative patterns on segment 6 and will be backdropped by mountains. With the use of non-specular conductors and treated towers, changes in the appearance of the landscape would be minimal. Segment 4, on the other hand, would change the appearance of the landscape because it would cut across the natural and manmade patterns of the Ninemile Valley and appear out of scale.

2. <u>Comment</u>: If you choose the Taft Route, you should do everything possible to lessen the impact on residents where the lines would cross the so-called sensitive areas, i.e., Ninemile-Clark Fork Valley Junction, because there are relatively few such areas along the route. Tower visibility should be measured with residents in mind, not passing motorists.

<u>Response</u>: Residential viewers were given more consideration than the passing motorist. Unfortunately, there is no way to route the line from east to west without affecting some people. BPA is doing several things to mitigate impacts. These mitigation measures include darkening towers to reduce visibility and selective clearing to reduce right-of-way visibility. Also, tower placement adjustments will be made if they would reduce overall impacts. (Also see Part II.N of this Volume and Chapter II of Volume I.)

3. <u>Comment</u>: Another example of the unreality of the social evaluation process can be found on pages IV-25 and IV-75. Here the alienation level for the Ninemile Valley area is given as "moderate." In contrast, the Rattlesnake Valley crossing is given an alienation level of "considerable." This alienation significance level for the Ninemile Valley area should be changed to considerable. Although we have controlled any public display of anger, the citizen comments, questions, and statements at the scoping sessions, meetings conducted by Senator Baucus, or the DEIS review meeting, could hardly be termed "moderate" alienation. Local anger at the WPPSS fiasco has in itself generated a "considerable" level of alienation. Anyone who attended the Missoula Electric Cooperative annual meeting would attest to that fact. Comments such as "if they build them, we'll knock them down" are not made by people "moderately" alienated.

<u>Response</u>: Although individuals in the Ninemile and Rattlesnake valleys may exhibit similar high levels of alienation toward the proposed project, there are two differences in overall alienation between the two valleys. First, the number of people who would be affected by the line is significantly greater in the Rattlesnake Valley. Second, the upper end of the Rattlesnake Valley, by virtue of its designation as a National Recreation Area, would inspire significant opposition from local, regional, and national interests. The socioeconomic team felt that alienation in the Rattlesnake Valley should be called "high" while alienation in the Ninemile area should be called "moderate" in order to reflect this difference. The significance of alienation (high, moderate, low) was a descriptive term in the socioeconomic ranking process, but all alienation areas were given equal weight.

## IV. N. ST. REGIS

Commentors from the St. Regis area addressed the project in general and specific impacts in their area, and recommended consideration of several alternative routes. When these issues are treated generally under Part II -SUBJECTS OF CONTROVERSY, or Part III - RESOURCE CONCERNS, references to the relevant section are shown below in parentnesis. Other, more site-specific comments on such issues as routing alternatives are addressed tollowing this summary.

Many commentors questioned the need for the project and expressed worries about paralleling by future lines (see Parts II. A. and II. C). There was a widespread desire to see the project placed in an existing corridor and to have it follow the least-cost Plains or Hot Springs route. Several commentors stated that if the line were built in Mineral County, it should avoid private land whenever possible (see Part II. I).

Commentors on specific local impacts touched on access roads increasing potential for trespass (see Part III. I), agricultural inconvenience effects (see Part III. C), and erosion and soils impacts from right-of-way clearing and access road construction (see Part III. G). They also expressed concern about TV/radio reception near the line (see Part II. H), about cultural resource sites (the Old Ferry Crossing and the Keystone-Fardee site) (see Part III. H), and about potential adverse social effects of non-local construction workers living in local towns (see Part III. I). They asked questions about the number of local workers that would be employed on clearing and construction crews and about the amount of law enforcement that would be needed to protect the line from vandalism (see Part II. L. 1).

Numerous commentors addressed visual effects on local residents and on recreationists (see Parts III. I and III. J), who are important to St. Regis and Mineral County for economic reasons. Others addressed the line's potential effects on wildlife, particularly big game, such as deer and elk, which are also important for economic reasons (see Parts III. I and III. K).

Several comments were received both on the line's impacts on recreational enjoyment of Mineral County and on the Taft Route's proximity to the proposed St. Regis Landing recreation site.

Many commentors noted the importance of the timber industry to the Mineral County economy and expressed concern about interference with logging operations (see Part III. I), about the line's potential to start fires, and about hindrance of aerial fire suppression techniques (see Part III. B).

There were also concerns about spraying of herbicides for right-of-way control (see Part III. L), on electrical shock effects on equipment and machinery, and on the hazards of children playing on or near the towers (see Part II. H).

A few commentors registered complaints about the study team's lack of contact with local residents during the socioeconomic study (see Part III. I) and about lack of acknowledgement of locally-generated alternatives in the past (see Part II. G.).

St. Regis and Mineral County residents suggested several route alternatives which included:

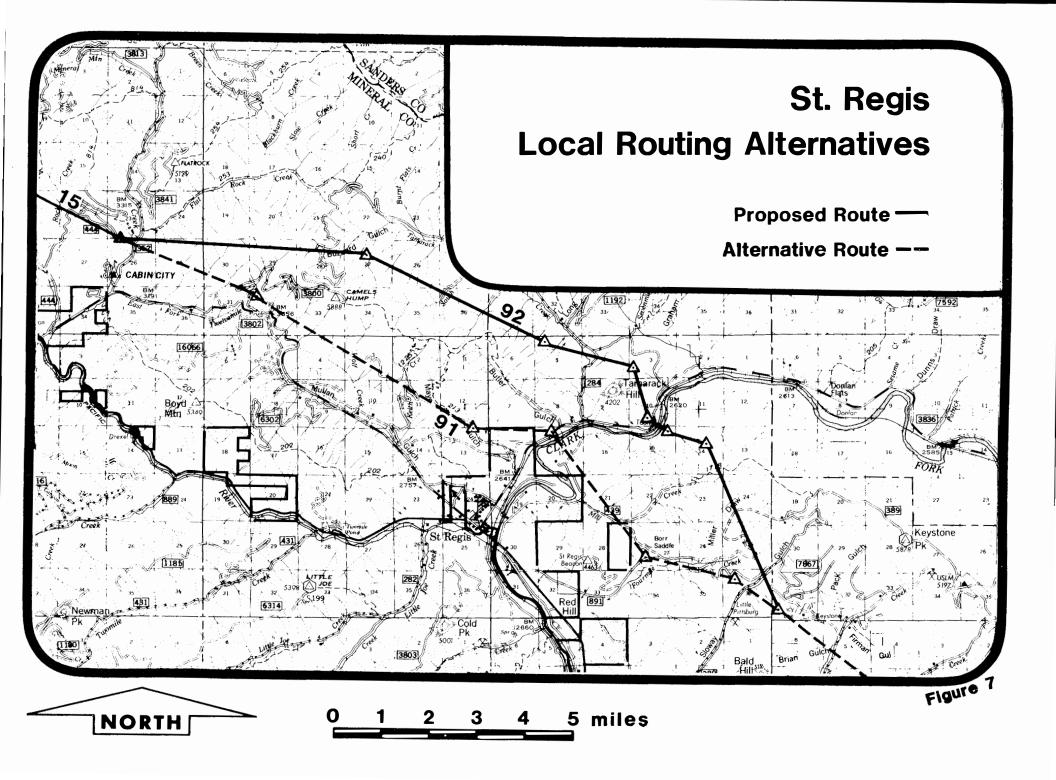
- 1. A route further north of St. Regis up Tamarack Creek;
- 2. A route along the unused Milwaukee Road right-of-way;
- 3. A route along the CC Divide (Cabinet-Coeur d'Alene or Mineral-Sanders County divide); and
- 4. A route along or near the Montana-Idaho State line.

A few commentors also expressed opposition to the Tamarack Creek route suggested by local residents and the U.S. Forest Service.

1. <u>Comment</u>: Preference that the Tamarack Creek alternative in the St. Regis area be chosen to reduce visual effects on residents and affect less private land.

<u>Response</u>: There were many objections to the original route's location near St. Regis. These prompted an effort to identify a better alternative. Two route alignments (fig. 7) were examined by the interdisciplinary study team. The Tamarack route, segment 92, runs north of Tamarack Hill, along the north-facing slope of the Tamarack Creek drainage, joining the originally proposed alternative (termed segment 91 for this comparison) at Twelvemile Creek. The study team's interdisciplinary analysis found segment 92, the Tamarack route, to be the overall preferred alternative, owing in large part to its lesser effects on such concerns as esthetics, socioeconomics, recreation, and land use. Also see table 2, Data Summary.

Impacts on human-related concerns are lower along the Tamarack route. Objections to the originally preferred route centered on the line's visibility. It would be highly visible to local residents, to travelers and



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from the planned St. Regis Landing State Park. Segment 92 is more compatible with the terrain and visual impacts would be more easily mitigated. Urban/ residential and socioeconomic impacts would also be lower along segment 92 since it affects fewer residences and less developable land, and since it avoids the planned park.

In addition, impacts on the area's recreational and cultural resources are lower along the Tamarack route. Recreation along segment 92 consists primarily of dispersed uses on which impacts would be minor. Segment 91 is less preferred due to impacts on the proposed reaction park and on visitors to the Mullen trail. Also, there is greater potential for disturbance of possible archeological sites and remnants of the Mullan Road along segment 91.

Impacts on wildlife, particularly mig game, would be higher for the original route, segment 91, since it crosses a greater amount of winter and summer range. However, for other natural resource concerns segment 91 is preferred. The east slope of the Clark Fork River crossing (crossed by segment 92) is rocky and steep and would require difficult and disruptive road and tower construction. In addition, this option crosses sensitive soils in the Tamarack Hill area, crosses overall steeper terrain, and requires greater access road construction. Fotential impacts on vegetation and water resources would also be greater along segment 92 because of its greater potential for disturbance.

Forestry impacts would be higher on the Tamarack route since it traverses a greater amount of forest with a high productivity rating and would affect forest management more adversely.

Segment 91 is highly favored from an engineering viewpoint. The Tamarack route poses greater costs for materials and construction in addition to the increased engineering and construction problems associated with the Clark Fork crossing.

The Tamarack Creek option (as summarized above) was examined to mitigate the effects of the original preferred route. Other mitigation measures would be the use of non-specular and treated towers, and selective clearing and road construction.

2. <u>Comment:</u> . . . the Draft EIS route [environmentally preferred Taft Plan] also would significantly lessen the environmental quality of the St. Regis Landing Recreation site. This site, located on the large peninsula just upstream from the proposed crossing of the Clark Fork River, has been coveted for years as a site for a park/recreational area. We identified this site as our top acquisition priority for river oriented sites. . . . Since that time the Montana Dept. of Fish, Wildlife and Parks has acquired 20 acres on "the landing" and is in the process of securing the 20 plus more acres. So our goal will very soon be realized. This long standing wish for recreational use of the site would be "rained on" pretty hard by the close proximity of a 500-kV line. The visual degradation alone would be enormous. The residents of the St. Regis area are very upset about the possible despoilation of "the landing."

<u>Response</u>: As summarized above, the Tamarack Creek alternative route north of St. Regis was evaluated and found to be environmentally preferred. One of the strong influences on this conclusion was the recreation potential associated with "the landing" located near St. Regis.

However, if the St. Regis alternative were to be used, then extensive mitigation to reduce the visual impact would be developed. This could include darkened towers, special appearance towers, and raising tower heights to reduce clearing needs, and/or tree-topping.

3. <u>Comment</u>: The esthetically sensitive Cutoff Road area has been considered for status as a state scenic route. The Lolo National Forest Plan calls for dispersed recreation and highlights the visual importance of the canyon. These open space values will be severely degraded by the existence of one hundred and seventy-five-foot tall towers looming over the landscape.

<u>Response</u>: The alternative option (segment 92; see fig. 7) that has been proposed would reduce visual impacts in this area. In addition, non-specular conductors will be used and towers will be painted to reduce visibility.

4. <u>Comment</u>: The CC Divide Route (Mineral-Sanders County Divide) also has several access roads to it. This route would also put the towers and lines back and out of the way. The [Taft] substation could again be put in the area west of Saltese on Federal land.

<u>Response</u>: Locating the transmission line along the CC Divide is not feasible because of engineering and reliability problems. It would be extremely difficult to design and build, and it would cost much more than any of the alternatives now being considered.

The CC Divide is a very crooked ridge ranging in elevation from 5,000 to 6,000 feet. A transmission line along the ridge would be exposed to strong winds, deep snows, and severe icing. These conditions would markedly impair the line's reliability and threaten electrical service to communities served by the proposed line throughout the region.

Such a line would be more expensive to build than the original alternative because of the ridgeline's winding character. Heavier angle towers and more extensive foundations would be required each time the line makes a bena. The cost, as compared to the alternatives, would be excessive. Also, inasmuch as few roads penetrate the area of the Divide, an extensive road system would have to be built, further escalating costs.

The environmental impact of a route along the CC Divide, if such a route were technically feasible, would be greater because of the need for roads and the increased susceptibility of the environment to disturbance as the elevation increases. Soils and hydrology at higher elevations are more vulnerable to impacts. As altitude increases, the vegetation becomes more fragile and recovers more slowly when disturbed. A study of the Divide in the early 1970's, specifically in the vicinity of Swamp and Cherry Creeks where a crossing of the Divide was being considered, was judged to be infeasible for the same reasons described above. There is no suitable place to cross the Clark Fork and approach the Divide between Plains and Tamarack Hill.

5. <u>Comment</u>: I visited with you last week at a hearing in St. Regis, Montana. The purpose of our discussion was the proposed 500-kV line which your maps show as passing directly over my home 2.5 miles east of St. Regis on Highway Rt. 135. My property is riverfront property below the highway and railroad. I am opposed to this particular line route for several reasons, which I have listed. It would appear to me that you would need one tower in the floodplain across the river from my property. This appears to be a very dangerous location to me. . . . Your maps show the proposed 500-kV line as passing directly over my home two and a half miles east of St. Regis on Highway Route 135. I do not want this line over my home or within 500 feet of it.

Response: Should it be necessary to follow the original route (segment 15), one tower would be needed on the floodplain of the Clark Fork River (refer to figure 4.14 of Volume 1). The tower would be 500 feet away from your house and should not pose any danger to any residences in the area. BPA has towers in other floodplains and has experienced no problems. An example is the Clark Fork River crossing east of Thompson Falls, Montana. Towers here have been located on Eddy Island for several years, posing no danger to local residences.

Proximity to houses was one reason for examining the Tamarack Creek alternative to the east. This route (segment 92) ranked better for urban-residential concern and has become the preferred alignment in the St. Regis area. It avoids your house by two miles. The original line was also located to avoid houses as much as possible. There are houses to either side of this segment in this area. If the line is constructed along this route, we will work with you to adjust the exact centerline location.

6. <u>Comment</u>: A line in the St. Regis area would certainly infringe on the air space needed for the private air strip located at St. Regis.

Response: A transmission line along the original location at St. Regis could limit approaches and departures to this airstrip, which is located just south of the line. BPA would work closely with the owner to mitigate effects should this alternative be selected.

The preferred route in this area, however, is the Tamarack route (as cliscussed above). This route is several miles downriver and would not affect the airstrip.

7. Comment: The only comment I've got is I'd like to see the BPA put more emphasis to figure out a line to go south of the [St. Regis] river. That's the only thing. Study it more close here than they have in the past; study like they have the rest of these power lines, routes that they've got planned so far or alternatives.

<u>Comment</u>: There was mentioned the high cost of roads. Again, nothing specific. A lot of road is already there on the Montana-Idaho State Line. The towers and lines would be hidden, out of the way, and no private property owners ripped off. The substation could be put in the East Portal Area west of Saltese, which also has an existing access road. No one lives in the area west of Saltese to the top of Lookout Pass on federal land.

<u>Comment</u>: Why wasn't the Montana-Idaho border up here considered as a route with the road already up there? And also putting the substation up at the East Portal instead of Taft, which has a road going in that too.

<u>Response</u>: A "state line" route from the Missoula area that would stay south and west of the Clark Fork River without crossing the river was found undesirable. Terrain barriers with very steep slopes, rock outcrop areas, areas of high relief, and places of shallow soil underlain with hard massive rock would be unavoidable. The road system would be extensive and almost entirely outside the transmission line right-of-way. Very few existing roads are available that could provide access to individual towers. There would be excessive ground disturbance due to slope. This route could also cross areas with high mass movement susceptibility, where special designs and mitigative measures would be required. This would increase cost.

Reliability of the transmission line and its roads would also be lower due to remoteness. Reliability decreases as accessibility becomes a problem due to deep snows and greater distance away from roads that are kept clear of snow. A considerable portion of this route would cross areas with elevations over 6,000 feet, thereby increasing the potential for erosion and visual scarring due to slow vegetative recovery. Icing and snow loadings at these elevations require heavier, more costly towers, shorter spans, and additional roads, none of which are visually compatible. A route could also not be located to avoid roadless areas whose management goals are to provide dispersed recreation in a near-natural setting and provide for wildlife species that are dependent on old growth timber. This route would cross seven major drainages in 25 miles, all of which have high recreation use, especially Fish and Petty Creeks. There are also numerous high mountain lakes up against the state line that have high recreation and scenic value and private and undeveloped subdivided land in lower portions of these two drainages.

8. <u>Comment</u>: The location of the potential Taft substation site needs further study to identify alternative sites. The present location would have high impacts on riparian zone management and water quality that can only be successfully mitigated through relocation. We wish to work with you to resolve these impacts.

<u>Response</u>: Cooperative site evaluation and location review have taken place. The Taft substation site is relocated away from the riparian zone and mitigation measures are specified in site development plans for this alternative.

9. <u>Comment</u>: The landowners and residents along Tamarack and Sevenmile Creeks and the Clark Fork River do not wish to have any transmission line near their property and residences. <u>Response</u>: The socioeconomic resource rankings took these concerns into account in the comparison of the St. Regis (segment 91) and Tamarack Creek (segment 92) route alternatives. However, similar concerns, as well as higher impacts for other socioeconomic factors, counterbalanced these concerns, leading to a conclusion of less impact and overall preference for the Tamarack option. As an example, there are five houses within 1/2 mile, and 19 within 1/2 - 1 mile (not including the town of St. Regis ) of segment 91. In contrast, there are no houses within 1/2 mile and only 2 houses within 1/2 -1 mile of segment 92. Mitigation measures, such as treated towers and conductors, have been proposed to reduce effects on residents along either option.

10. <u>Comment</u>: The residents of the St. Regis area are . . . also furious about the route across private lands, the Tamarack Park subdivision was platted on land in the path of the line. Lot owners and others in the area feel that their investment in land will be ruined unless the line is moved. Public sentiment would be greatly reduced should BPA do the prudent and environmentally "right" thing and relocate the line.

<u>Response</u>: The proposed route crosses to the southwest of the Tamarack Park subdivision. According to subdivision and certificate-of-survey maps on file at the Mineral County Courthouse, the line would cross just over 1/4 mile away from either the nearest existing residence or the nearest undeveloped lot. As described in the response to comment #1, the alternative in the Tamarack Creek drainage is now the preferred option.

The concept that transmission lines ruin land investments is a highly controversial issue. As discussed in Appendix D, the studies on this subject have yielded inconclusive results; thus it is not possible to draw conclusions about the line's effects on local real estate investments.

ll. <u>Comment</u>: I would like a definition of "environmentally sensitive." Why
isn't St. Regis environmentally sensitive?

Response: "Environmentally sensitive" areas are defined on p. 10, Attachment 4, Appendix A, "Methodology." As stated in this discussion, these are areas where transmission line construction, operation, and maintenance activities could cause highly intense or otherwise significant impacts on one or more resources in the same general area. This factor was developed to describe unique and distinct areas which might not be adequately identified by considering resource topics separately. The areas were defined together by the environmental team and reconnaissance engineers. These analysts reviewed the route ranks and impact assessment information and performed an overlay analysis of the high impact areas defined for each resource.

Recognizing that all areas are sensitive to some degree, the goal of this evaluation was to identify the highly sensitive areas that would be affected by the line. These are shown in figure 2.5 of Volume I. In deciding which areas would qualify as major "environmentally sensitive areas," the following factors were taken into account: impact intensity and the effects on multiple resources; scale and areal extent; impact probability; mitigation; and public concern.

St. Regis was identified at first as being more environmentally sensitive than surrounding areas, but was not one of the areas ultimately mapped because assessments of impact probability and intensity were lower and predictions of the success of mitigation were higher than for other sensitive areas. Subsequent public and Forest Service concern for impacts in this area lead to a reassessment of this conclusion and an evaluation of the Tamarack route alternative avoiding St. Regis, as discussed above. The St. Regis area has also been added to the map (figure 2.5) of environmentally sensitive areas.

12. <u>Comment</u>: The shortsightedness of BPA is further demonstrated in the specific routing of the southern [Taft] alternative. At no point was the public consulted for designing this route. And any of our suggestions on alternate routes through Mineral County were immediately condemned by BPA engineers who had never been out on the ground and had no practical knowledge of the terrain, vegetation, topography or local concerns.

Response: A public workshop was held in Superior, Mineral County on March 26, 1980, to identify concerns of area residents and seek review of preliminary transmission corridors. An open-house meeting was also held on June 23, 1981, to obtain additional information from area residents. Suggestions made in these forums were included in analysis of the proposed transmission line.

BPA met subsequently with St. Regis area residents in December 1981 at a meeting conducted by Kayle Jackson of U.S. Senator Max Baucus' staff. BPA engineers have field-reviewed route alternatives through Mineral County. Results of this review are included in responses to comments in this part. Response to local concerns was documented in a March 8, 1982, letter from BPA Administrator Peter T. Johnson to U.S. Senator Max Baucus.

#### IV. O. SUPERIOR

Superior area residents addressed a wide range of local issues. These issues are treated in Volume I, Chapter IV and under Part II - SUBJECTS OF CONTROVERSY or Part III - RESOURCE CONCERNS. References to the relevant section are shown in the summary below in parenthesis.

The comments expressed great concern about the line's removal of any of Mineral County's scarce agricultural land from production (see Part III. C). Similarly, they were concerned about forest land being removed from production and a consequential drop in Forest Service receipts paid to Mineral County (see Part III. I). The comments also expressed concern about the project's potential adverse effects on residential and commercial property values (see Part II. J).

Several commentors expressed concern about adverse effects on scenery (see Part III. J), recreation patterns (see Part III. D), and wildlife (particularly big game animals) (see Part III. K), and the consequences for local residents who are economically dependent on the local recreation, hunting, and tourist business (see Part III. I). Other commentors addressed such diverse issues as construction period traffic on county roads, law

enforcement problems when construction workers were present, and the opening up of mining areas to trespass (see Part III. I).

A few commentors expressed concern about impaired TV/radio reception (see Part II. H), and water resource impacts, especially when municipal watersheds were involved (see Part III. F). One commentor asked about the possibility of undergrounding in Mineral County (see Part II. M) and another asked why the Osburn Faults weren't mentioned in the EIS (see Part III. G). One commentor expressed concern about the line's long-term health effects (see Part II. H). Another commentor asked about compensation for damage should the line cause a forest fire (see Part II. J). And finally, one commentor requested more public involvement in siting the line (see Part II. G. 1).

## IV. P. FLATHEAD INDIAN RESERVATION

Commentors concerned about the project's effects on the Confederated Salish and Kootenai Tribes and the Flathead Indian Reservation addressed several controversial issues. Some commentors questioned BPA's right to utilize an existing 230-kV right-ot-way for a 500-kV double-circuit line and stated that such use was beyond the scope of the existing easement (see Part II. D. 3).

One commentor stated the draft EIS did not give proper treatment to the Tribes' arguments. Another commentor stated that "the Confederated Salish and Kootenai Tribal Council should not be perceived as a problem to be dealt with, but given the respect and consideration due to the governing body of the tribal membership." (See Part II. G. 2, Comment #27).

One commentor stated that the route across the Reservation had not been considered in enough detail, and another inquired about payment arrangements between BPA and the Tribes. Also, questions were asked about the issue of reliability of double-circuit lines (as opposed to two single-circuit lines) and the effects of future upgrading of the proposed lines (see Part II.L., comment #10).

In addition to the mitigation measures listed in Volume I, Chapter II, common to all plans, nonspecular conductor and treated towers would be used to reduce line visibility. In the Rainbow Lake vicinity, an existing line would be removed and a double-circuit line rebuilt in its place to avoid land use conflicts and minimize additional clearing and road construction. Also, the Tribes would be consulted should any survey or test be conducted for subsurface remains at the historic Indian encampment near Dixon. Any remains would be avoided should they be determined eligible for nomination to the <u>National Register of Historic Places</u>. Using existing right-of-way and access roads as much as possible would greatly reduce the possibility of direct impact to these sites and possible prehistoric sites in the area.

1. <u>Comment</u>: Indian concerns have been listed in the draft environmental impact statement; however, saying that they were given a fair presentation would not be accurate. This is especially true in the several instances where the draft refers to the "potential difficulty of crossing the Flathead Reservation," as opposed to saying, "the concerns of the Confederated Salish

and Kootenai Tribes relating to health and safety issues, jurisdiction, legal issues, environmental issues, social and economic considerations, etc.," with a presentation and discussion of each. The Confederated Salish and Kootenai Tribal Council should not be perceived as a problem to be dealt with, but given the respect and consideration due to the governing body of the tribal membership, the tribal homeland and of all the resources found there.

<u>Response</u>: BPA, aware of the quasi-sovereign status of Tribal governments, held numerous meetings with the Tribal Council of the Confederated Salish and Kootenai Tribes throughout the EIS process. Environmental, social, and economic issues raised by the Tribes are consistent with issues raised by non-Indian commentors. Thus, the term "potential difficulty of crossing the Flathead Reservation," as used in the Draft EIS, refers only to uncertainty surrounding the legal status of BPA's existing right-of-way across the reservation. See Part II. D. 3. for a detailed response to the right-of-way issue.

## IV. Q. FLATHEAD RIVER

This section refers to the area where the Flathead joins the Clark Fork River. This area would be crossed if Alternative B - Plains Plan were selected. Commentors stated that the scenic beauty and wildlife of the area would be destroyed by the presence of a transmission line and that local residents' enjoyment of the area would be greatly reduced.

Proposed mitigation includes the use of non-reflective conductors, treated towers, and selective clearing. Long spans would be used where the terrain allows, and existing roads would be used as much as possible. Road construction would use low gradient cuts and be kept to a minimum. In addition, immediate seeding of disturbed sites and special erosion and drainage controls would be implemented. These mitigation measures would reduce impacts on many resources, including diminishing the line's visibility at the confluence of the Clark Fork and Flathead Rivers near Paradise.

# IV. R. PLAINS

Commentors from the Plains area addressed agricultural and economic issues, the need for the line, and BPA's public involvement process. They also expressed great concern about the number of energy and transportation corridors already running through the Clark Fork Valley. Where these issues are treated generally, under Part II - SUBJECTS OF CONTROVERSY, or Part III -RESOURCE CONCERNS, references to the relevant section are shown in the summary below in parenthesis.

More specifically, commentors on agriculture expressed concern about potential impacts on farmland and ranchland located adjacent to but not in the transmission line right-of-way. They also asked whether towers for new lines could be aligned with towers of existing lines (see Part III. C). Others asked about the amount of local labor that would be hired and stated that the line's esthetic impact on the local tourist economy would be severe (see

Part III. I). Others focused on property value effects and stated that affected landowners should be given the option to sell out completely to BPA rather than be compensated for an easement (see Part II. J). Still other commentors stated that the line should be built by a private utility and asked BPA to make payments in-lieu-of-taxes (see Part II. K).

Additional commentors questioned the reliability of load projections and stated that shipping coal by rail would be better than building a transmission line, as it would provide local jobs and encourage conservation by raising the price of energy (see Part II. A). Other comments expressed concern about the potential Plains Substation acting as a magnet for future lines (see Part II. C) and asked what the line would be used for after Colstrip ceased operations (see Part II. L. 1).

Plains commentors also noted that the Clark Fork Valley was already congested with energy and transportation corridors. Several stated that the valley snould be "cleaned up" before an additional line was built. Others asked for more information on BPA's plans to consolidate lines in the valley if the Plains Plan were built (see Volume I, Chapter IV and Part IV. T of this Volume for a discussion of consolidation in the Clark Fork Valley between Plains and Thompson Falls).

In addition, there were concerns about TV/radio reception problems (see Part II. H) and about wildlife reluctance to move around existing lines (see Part III. K). There were questions about revegetation of the corridor after a line is built (see Part III. L). Finally, a few commentors expressed desires to see the people responsible for making the final route decision present at public involvement meetings (see Part II. G. 1).

Proposed mitigation measures are similar to those discussed in IV. T, Thompson Falls, below.

## IV. S. THOMPSON FALLS

Commentors from the Thompson Falls area addressed many issues of general concern throughout the study area such as health/safety, agriculture, economic impacts, need for the line, and public involvement. They also addressed the specific land use effects an additional line would have in a narrow valley already tull of energy and transportation corridors. These issues are treated generally under Part II - SUBJECTS OF CONTROVERSY or Part III - RESOURCE CONCERNS, and summarized below, with references to the relevant section in parenthesis.

Commentors requested that more research be done on the subject of biological effects. They also expressed concern about children playing around electrically charged objects and about potential restrictions the line would place on people who wear pacemakers (see Part II. H). Other commentors highlighted the inconveniences of farming around towers (see Part III. C) and stated that an annual payment for easements would be better than a one-time payment (see Part II. J). They also stated that the figures for land taken out of production in the EIS were too low (see Part III. C).

Commentors felt that the visual effects of the line would reduce the area's potential for economic development and adversely affect tourism. Others asked about the cost of providing law enforcement and schooling for construction workers and their families (see Part III. I).

Several commentors expressed concern about property devaluation and stated that more information was needed on procedures for compensating landowners. A few comments suggested that landowners should be given the option to sell all of their property to BPA rather than simply be compensated for the easement taken (see Part II. J).

Many felt that all of the project's benefits would accrue to out-of-state residents and that BPA was building a line planned by Montana Power Company. Most of these comments addressed the revenues foregone issue and stated that the need for the line should be reevaluated (see Parts II. A and II. E). A few also asked what would happen to the right-of-way after the line was abandoned (see Part II. L). Many commentors felt that the addition of another transmission line would have disastrous effects in the narrow Clark Fork Valley, which they saw as already full of other energy and transmission lines. They stated that another line would unfairly burgen local people who are already suffering enough.

Finally, some commentors stated that BPA's public involvement process pitted neighbors and valleys against one another and diffused opposition to the project. A few comments also stated the desire to see people who would ultimately be responsible for making a siting decision present at the public involvement meetings (see Part II. G. 1).

As discussed in Volume I, proposed mitigation in the congested, environmentally sensitive Clark Fork Canyon (segment 18) would involve removal of portions of an existing line and rebuilding a multi-circuit line in its place. This consolidation of facilities would avoid increasing the effects on many resources and land uses. Any construction necessary off existing roads in wetland areas will attempt to avoid damage to wetland vegetation. As in all areas, should towers for the new line be placed in new locations on the Clark Fork or Prospect Creek floodplain, areas around the old and new tower sites would be regraded to match surrounding contours and reseeded.

BPA will coordinate with the U.S. Fish and Wildlife Service and other agencies to avoid construction impacts when bald eagles are present in the area. Non-specular conductors and treated towers would be used in this area to mitigate esthetic impacts.

## IV. T. EDDY ISLAND

Although residents of the Eddy Island area are concerned about the same set of environmental issues as voiced elsewhere, the comments from this area expressed most concern about the fact that there were already one 500-kV, two 230-kV, and two 100-kV lines in the Eddy Island area near Thompson Falls (see Parts II. B, II. L, and discussion above). The comments noted a concern that an additional line would make the property in the area useless and not suitable for either sale or development. The commentors also stated that if an additional line were installed, BPA should be forced to purchase all of the affected properties (see Parts II. J and III. A).

Proposed mitigation in the Eddy Island area is discussed in Volume I, Chapter IV, and in Part IV. T, Thompson Falls, of this Volume.

#### IV. U. HAYDEN LAKE

Commentors from the Hayden Lake area of Idaho shared many general concerns with other residents of the project area but also addressed several local route location issues. When these issues are treated generally under Part II - SUBJECTS OF CONTROVERSY, or Part III - RESOURCE CONCERNS, references to the relevant section are shown in the summary below in parenthesis. Other, more site-specific comments are addressed following this summary.

Commentors addressed a wide variety of concerns. One commentor stated that the uncertainty about health and safety issues should be resolved before the line is built (see Part II. H). Another expressed concern about property devaluation (see Part II. J). Others expressed concern about erosion and soils effects and sedimentation of streams (see Part III. G and discussion below). Still others were concerned about potential esthetic effects on residents and recreationists near Chilco Lake and as the line would cross and descend Henderson Mountain (see Part III. J). In addition, a few commentors focused on wildlife (particularly fisheries) impacts and on the importance of recreational resources to the area's residents and economy (see Parts III. D and III. I). Also, several commentors felt that a new transmission line would interfere with forestry and timber management practices such as logging, road building, and slash burning (see Part III. B).

Some commentors questioned the need for the line and stated that BPA is involved in the project because of its ability to construct a line through environmentally sensitive areas by using eminent domain. Another commentor stated that BPA should notify all property owners located near the proposed alignment (see Parts II. A and II. G).

Finally, several commentors suggested that other routes along an existing right-of-way and south of Hayden Lake near Coeur d'Alene should be considered, while another requested that BPA consider a route north of Ohio Match Road (see discussion below).

As discussed in Volume I, proposed mitigation includes relocating the line to the north of the Hayden Creek area by several miles to avoid impacts on fishery, recreational, and cultural resources as summarized in the response to comment #1 (see tigure 4.1 in Volume I). To minimize visual impacts, mitigation measures involve the use of treated or special appearance towers and non-specular conductors, in addition to reduced clearing and tree-topping at highway crossings. Where the route encounters sensitive soils in the Chilco Lake area, particular attention will be paid to careful road design, stringent erosion controls, and proper construction practices. Project follow-up will include monitoring and immediate mitigation of erosion instigated by construction or maintenance activities.

1. <u>Comment</u>: However, if it is built, I would like to see the Forest Service recommendations implemented in the Hayden Creek area to help mitigate the impact on the fisheries up there.

<u>Comment</u>: The Idaho Department of Fish and Game has reviewed the Draft Environmental Impact Statement for the proposed Garrison-Spokane 500-kV transmission line. From a fish and wildlife standpoint, alternative C, Taft Plan is the most favorable. This line would traverse portions of the Coeur d'Alene National Forest that are already heavily roaded and disturbed due to past logging activities.

Our major concerns with this project involve the Hayden Creek drainage and the drainage that suplies water to the Mullan Fish Hatchery. We would support modifying the route to minimize negative impacts to the Hayden Creek drainage and further request that you avoid the water supply at the Mullan Hatchery.

<u>Response</u>: BPA, in cooperation with the Idaho Panhandle National Forest, has modified the original route by several miles north of Hayden Creek, in response to the above concerns. The new alignment crosses the North Fork of Hayden Creek at an angle and continues south of Hollister Mountain across to Chilco Lake and Highway 95. The new alignment crosses sections 13, 14, 15, 16, 17 and 18 of T. 52 N., R. 3 W. This change is reflected in the route overlays for figures 4.2 through 4.10 in Volume I.

This route location would minimize or avoid negative impacts to the Hayden Creek drainage expressed above. The Hale Fish Hatchery is located along the South Fork of the Coeur d'Alene River east of Mullan. The proposed route in this area (segment 26) parallels the river for approximately two miles. However, the line would be located along the upper slopes far enough away from the river (a distance of 1/4 - 1 mile) so that construction activities would have little effect. Sedimentation would be primarily short-term, during construction. Mitigation measures will be instituted to reduce sedimentation and consequent reduction in water quality in the fish hatchery area. These measures include using low gradient road cuts, limiting construction during periods of adverse ground conditions, and seeding quick-growing grass species at disturbed sites. Drainage structures and other standard measures (see <u>Mitigation Measures</u>, Chapter II of Volume I), will also be used to prevent rapid runoff and minimize siltation.

2. <u>Comment</u>: [East of Chilco Lake the Taft] route bisects state land [in Section 16 and] would eliminate more valuable, highly productive north slope timber land than [a] . . . second line location [along the north boundary of Section 16]. It would also cross two tree plantations which the department [State of Idaho Department of Fish and Game] has invested many dollars in site prep and planting. Furthermore, its location would make management of the remaining state land more cumbersome in that it bisects our ownership at an angle. Power lines present problems when dealing with forestry operations such as logging, road building and slash burning operations. Perhaps an alternative would be to move the proposed line north of state land and behind the ridge line. No matter what you do, the line will be visible as it crosses and descends Hollister Mountain.

<u>Response</u>: An adjustment located in coodination with the concerned landowners avoids the intensively managed areas mentioned above and reduces the impact on highly productive forest land. This tentative route location closely follows the Section line as suggested. Although centerline adjustments may be necessary, they should not hinder management of State lands for forest production. As stated in Volume I under <u>Mitigation Measures</u>, Chapter II, BPA will work closely with state personnel to coordinate access road and clearing to minimize impacts on state land.

3. <u>Comment:</u> . . . The Forest Service recommendations minimize project impacts on [the] Hayden Creek areas, . . . recreation resources.

Response: As discussed in the summary at the beginning of this section, the location adjustment in the Hayden Creek area will minimize recreation impacts.

4. Comment: I live along the chosen route for crossing north Idaho in an area that is rapidly being developed (referred to as "dispersed development"). The area is just north of Hayden Lake and is accessed by the Garwood and Ohio-Match area with more being built. For this reason I strongly recommend running the line as far north of the Ohio-Match Road as possible. In a phone conversation with Jay Marcotte on May 27, 1982, he indicated to me that a map of 3/24/82 indicated the route as running approximately between sections 8 and 17, 9 and 16 and then at a point in Section 15, turning southeast toward Badger Mountain. (This is in Township 52 North, Range 3 West, B.M. and 2 West B.M.). Even though I would rather see the line run on the north side of Holister Mountain, I feel the line described by Marcotte would be sufficiently distant from the "dispersed development" to satisfy the evaluation criteria on Page I-13 No. 1A, "Avoids residential and inhabited areas", and is sufficiently distant to minimize the impact other than some visual. For which I would recommend tower painting and care in placement with minimal clearing. Please avoid the Hayden Creek drainage as much as possible.

<u>Response</u>: In an attempt to locate the transmission line with as little interference with homes and development as possible, BPA has done extensive work in this area. As a result, the line has been located as far north of the Ohio Match Road as practical without increasing impacts.

Although it is impractical to locate the line on the north side of Hollister Mountain, BPA has worked with the Forest Service to relocate the line to minimize impacts on Hayden Creek and Hells Canyon. The present alignment closely matches the alignment given to you by Jay Marcotte.

The recommendations for tower darkening, special tower siting and reduced clearing are being proposed as part of BPA's mitigation.

5. <u>Comment:</u> ... I would ... prefer that you ran the line ... straight, basically from Badger Mountain due west [and not try to remain on public land].

<u>Response</u>: An alignment as suggested in your letter was looked at by BPA but was found to have more adverse impacts than a more northerly alignment. Both the US Forest Service and the Idaho Department of Fish and Game oppose any alignment that comes near Hayden Creek or Hells Canyon. This is because of the high value placed on Hayden Creek as a fish spawning stream and the high recreation value of Hells Canyon. Because of these concerns, BPA has worked closely with the USFS to readjust the alignment to the north, as summarized above.

## IV. V. OTHER GEOGRAPHIC AREAS OF CONCERN

In addition to the geographic concerns presented above, a few other geographic-specific comments were received. These are presented below.

1. <u>Comment</u>: When constructing the new BPA line on our area [Rathdrum Prairie], please consider alignment of the steel towers with the existing ones across our meadow and up the wooded hills so the towers don't appear to be invading the whole area. As you can see, we are surrounded!! Please allow the growth of the existing trees as possible.

<u>Response</u>: Any location through the Rathdrum Prairie to Spokane will be on existing BPA easements. Originally, a 425-foot wide easement was obtained and only the BPA Bell-Noxon 230 kV line occupies the right-of-way at this time, leaving approximately 300 feet available for additional lines.

Tower placement for the Garrison-Spokane 500-kV will be adjacent to and north of the existing steel towers on the Bell-Noxon line in most cases.

2. <u>Comment</u>: I still don't know where this line [Hot Springs] is proposed going as far as in relation to St. Ignatius is concerned.

Response: For Alternative A - Hot Springs Plan, the existing BPA 230-kV line which the 500-kV line would parallel is approximately 10 miles west of St. Ignatius.

3. <u>Comment</u>: We have rather limited livable land in this narrow little valley here, and where I live up Prospect Creek, it's really more limited by somebody else's other than your lines unless you decide to go through Prospect Creek. It's Washington Water Power that has to be concerned. They don't even have one representative to talk to. They don't think it's important enough to send anybody around to hear what people have to say.

<u>Response</u>: The BPA 500-kV route west of Thompson Falls was located on the side slopes above Prospect Creek to avoid land use conflicts in this congested valley. As stated in Volume I, the Washington Water Power Company Thompson Falls alternative would parallel the BPA route to Glidden Gulch (see figure 4.1 in Volume I). If both of these plans were to be selected, the possibility of placing both sets of lines on one set of double-circuit towers would be strongly considered. The Washington Water Power Company has been working with BPA on this project; a Washington Water Power representative has attended all public meetings on the DEIS.

# **Summary of Public Meetings**

#### V. SUMMARY OF PUBLIC MEETINGS

When a draft environmental impact statement is completed and printed, it is circulated to interested members of the public, the media, and governmental agencies. Readers are urged to review the document and the findings and to comment on both, either by letter or in any of a number of public meetings. For the Garrison-Spokane project, rourteen open houses and fourteen meetings were held in communities throughout the study area to answer people's questions and to allow any concerned individual or agency to enter comments officially into the record. The comments were then reviewed and are answered in this, the final document. Parts II-IV of this volume constitute the comments and answers for this project, together with the actual changes incorporated in the EIS itself.

In each community, an afternoon open house was held to allow people to ask questions informally, to familiarize themselves with the project, and to meet some of the resource specialists who worked on the project. Maps and air photos were provided for close inspection, and handouts on issues of concern such as biological and electrical effects were available. Copies of maps were also available for people to take home with them. Numerous photo panels depicted various aspects of construction and impact mitigation. Resource specialists circulated to answer questions and interpret maps.

These open houses were followed by the formal public meetings. A Montana facilitator ran the meetings, ensuring that everyone who wished to speak had a fair chance at presenting his or her views. A court recorder took a complete record of each meeting. After a brief presentation on the role of Bonneville Power and a description of the basic choices for the project, the floor was open to speakers. Those who had signed up indicating a desire to speak were called first; others were encouraged to speak as well. After a break, the meeting turned its focus to questions and answers: members of the public were encouraged to ask questions so that information could be given or misunderstandings cleared up. The team leaders and resource specialists present were called on to respond until no more questions were raised and no more presentations were requested.

Meetings were held as follows:

|                   |          | Attendance |
|-------------------|----------|------------|
|                   |          |            |
| Spokane, WA       | April 12 | 10         |
| Coeur d'Alene, ID | April 13 | 25         |
| Wallace, ID       | April 14 | 19         |
| St. Regis, MT     | April 15 | 56         |

|                              |                      | Attendance |
|------------------------------|----------------------|------------|
| Missoula, MT<br>Drummond, MT | April 19<br>April 20 | 132<br>121 |
| Lolo, MT                     | April 21             | 22         |
| Philipsburg,MT               | April 22             | 68         |
| Frenchtown, MT               | April 26             | 38         |
| Superior, MT                 | April 27             | 48         |
| St. Ignatius, MT             | April 28             | 12         |
| Plains, MT                   | April 29             | 37         |
| Potomac, MI                  | April 30             | 14         |
| Thompson Falls, MT           | May 3                | 43         |

The issues raised at any given meeting varied widely over the study area, just as the lives and interests of people vary from community to community. The issues of greatest concern--such as health and safety, property value impacts, need for the line or the power, and the building of the line on public instead of private land--became major headings in Part II of this volume, entitled SUBJECTS OF CONTROVERSY. Because issues did vary from place to place, they are also characterized under GEOGRAPHIC AREAS OF CONCERN (Part IV). These divisions reflect concerns received both by letter and by transcript of the public meetings. What follows below is a summary, meeting by meeting, of the major issues raised in each transcript.

#### A. SPOKANE, WASHINGTON

April 12, 1982

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At the first public meeting, six people spoke on a variety of issues. The major focus was on health and safety issues and on concerns for future corridor planning, although comments were also received on other subjects such as the need for the power, the potential impact on property values, and the possibility of undergrounding or of using other means to provide the power.

People were concerned about the possible expansion of the corridor to include more of their land, which would preclude certain uses--such as constructing a building. Questions were received on future planning, both on future needs on the West Coast that might affect people in this area, and on the number of lines that might be expected in the corridor.

Particular interest was expressed in whether other alternatives--such as hydro or wind power--were available to supply the power needed and whether BPA was interested enough in these alternatives to spend money in research. A related question was whether the line was in fact needed at all.

Several questions were received on the possibility of biological and electrical effects on people or animals and on the extent of BPA studies on this topic.

#### B. COEUR D'ALENE, IDAHO

April 13, 1982

Comments made by the seven speakers at the Coeur d'Alene meeting focused on the need for the power and on concern that the Forest Service recommendations for routing near Hayden Creek be followed. Several speakers expressed support for those routings, designed to mitigate impacts on fisheries and wildlife, as well as on esthetics. Whether the line was needed at all was also questioned, in light of the recent BPA forecasts of reduced demand for power in the future and in light of the Bunker Hill mine closing.

One individual expressed concern that the past negotiations for right-of-way compensation, though seemingly adequate at the time, dia not anticipate this greater increase in voltage and size of tower. He hoped that new negotiations might take place to reflect the changes in value of the land and in the design of the facilities.

Concern was also expressed for potential sedimentation effects in the Hayden Lake and Hayden Creek area, where erosion has already taken place due to a residential development.

# C. WALLACE, IDAHO April 14, 1982

Seven people spoke at the meeting held in Wallace. Comments and questions ranged over a variety of issues, with no outstanding area of concern. More comments (3) were made on esthetics than on any other subject, however.

A mining firm representative expressed a preference for the Hot Springs route, as it affected forest land less, cost less, and would affect the landscape the least of the three alternatives. Concern was expressed for choices of route alternatives near the Osburn Fault, as access road needs could interfere with mining operations. Substantial concern was also expressed over the esthetic effect of seeing the line from Lookout Pass: "It's a spectacular view and thousands of photos with people entering Idaho by that sign up there are taken from this vantage point each year and a swath across those hills to the north of Mullen (segment 26) would be a very big eyesore."

Concern was also expressed over the choice of locating the line in the relatively flatter land in the valley rather than on the steeper (and therefore potentially less useful) land in the hills. Some people felt that the line should be located on public (steeper) land rather than private (valley) land.

Numerous questions were asked of the Washington Water Power representative as to location of the substation and plans for its construction.

Concern was also expressed by one ranch owner that a choice of the Hot Springs route would mean a substation in the middle of his ranch, with consequent severe effects on his means of livelihood. Garrison-Spokane EIS Wgl363:02-07-83

Finally, a question was raised on how the Taft route could be environmentally preferred when the speaker saw clear impacts on a number of resources in his own area.

## D. ST. REGIS, MONTANA April 15, 1962

Over thirty people spoke at the very well-attended St. Regis meeting. Many concerns were voiced on a variety of issues, with particular emphasis being focused on the impacts not only on St. Regis but on Mineral County as a whole. Subjects which received more comments included: social and economic effects on the area; the use of existing as opposed to new right-of-way for the line; esthetics; biological and electrical effects of the line; cost of the line; and the methods of study and the degree of public involvement, as well as the adequacy of the EIS. Concern was expressed not only for the immediate St. Regis area but also for a proposed alternative routing that would avoid direct impacts on the residents of St. Regis but which would proceed up the Tamarack Creek area and which would affect the fewer residents there.

One resident of Tamarack Creek read a letter in which feelings about the Tamarack alternative were expressed: "Our reasons for choosing to live where we do are to be able to be self-sufficient, non-burdening to any other person or persons involved with so-called commercial, social improvement, governmental agency or unnecessary forms of mechanically created power. . . We live here by choice without outside power sources and jointly inform BPA and any other organization . . . that we don't want your power lines near us." Particular concern was expressed for the opening of new right-of-way through previously unburdened land in this area and for the consequent effects on natural scenery and wildlife. The area was called by one individual "one of the very finest kind of wilderness areas that's left in Mineral County."

Many social and economic effects were noted by area residents. One resident questioned the accuracy of BPA assertions that property adjacent to rights-of-way might increase (rather than decrease) in value. The estimated tax loss of \$2,637,000 to Mineral County was a source of great concern to the residents, as they felt that the residents of the county would therefore end up "paying for it all." Such concerns were also expressed in terms of impacts on people's livelihood: "A hundred twenty-five foot right-of-way will never grow another tree that will produce timber. There's two hundred miles of road that will never grow another tree that produces timber. We're talking about money for this county." A particular point was made to convey to the decisionmakers that they consider the future value of timber as a cost of the line.

Recreation opportunities in general were seen to be of particular importance for the county, and liable to suffer should the lines go through: "Mineral County has for many years been pretty scenic, has relied on tourism and the dude ranches and people that come in here through the summer and the fall is a big source of income for this small county, and if we're going to be saddled with BPA power lines going through some of our most scenic places in this county, we are going to be seriously handicapped for the rest of our lives...". Another individual pointed out that the county has "three calling cards . . . logging, aesthetic beauty, and recreational" and that all three resources would be adversely affected to a significant degree by the proposed southern route. He pointed out that these impact findings were not consistent with the rating of the Taft route as that of least environmental impact.

Particular recreational concerns included the ability to relax in the quiet of a rural or wilderness atmosphere and enjoy the outdoors, a potential that could, in the minds of the residents, be compromised by the presence of a large power line. The increase in access roads into hunting territory was also a source of recreational concern. Residents were unable to understand how the ranking values for big game were so low in an area that prides itself on its game and hunting opportunities.

Responsiveness to the wishes and interests of the people in the study area came under question at this meeting, with regard to the involvement of the people, the attention paid to suggestions made by individuals at earlier meetings and seemingly not responded to, and the extent to which Mineral County's relatively smaller population counted against it in an environmental reckoning: "It seems to me (that) they're going through Mineral County because there are fewer people, less voice and it's like a river that flows; it takes the path of least resistance. It's gone here and finally gone right over here where there's fewer people, fewer political clout, and we're just going to get it shoved down our back door whether we want it or not." One resident questioned the adequacy of the socioeconomic study done for the project, asserting that no one had been interviewed in this area. Another individual asserted that the southern route was not "environmentally preferred" but only "politically preferred." The assertion was also made that the "small people's" voices don't count when the public is dealing with BPA. Numerous individuals supported this view. Concern was voiced over the extent to which previous suggestions made for routing (such as up near the CC divide) had been seriously considered and responded to by BPA personnel. A question was raised as to why the decisionmakers were not available directly to people who wished to voice their comments.

Questions were also raised as to now much weight each item considered had in the ranking process. The speakers felt that they could not judge the value of the EIS when they could not discern how decisions had been made on environmental impacts: "...there's no way that you can come with a magic number to assign to aesthetics, eagles there, and somebody has to arbitrarily assign values to these things and add these things up and say this is the best one environmentally. The point is it was arbitrarily done to begin with."

Preference was frequently expressed for the Hot Springs route, on the grounds that it did not open up new right-of-way, that residents along the present line were used to the sights and sounds of a line, and that it would cost the least--thereby incurring the least cost to the ratepayers who would eventually bear the burden of cost for the line. Garrison-Spokane EIS Wgl363:02-07-83

Questions were raised on the potential health effects that a line might have on the residents of a area--from direct contact to interference with pacemakers. Questions were also raised on the effects of the line on radio and TV reception, particularly on mobile units needed for emergency communications and on the translator signal in the St. Regis TV district.

Some question was raised as to the need for the line in view of the recent BPA forecasts of lower load growth. A speaker also questioned whether the No Action alternative was being seriously considered as a consequence.

## E. MISSOULA, MONTAWA April 19, 1982

More than thirty people spoke at the Missoula meeting. Among the many subjects addressed, the issues most often mentioned were: health and safety; the potential for undergrounding the line to mitigate health and safety and esthetic effects; impacts on communities of people; economic impacts in the form of property devaluation and tax loss; need for the line and the power; and adequacy of the studies in the EIS.

Numerous people expressed concern about what effects the line might have on their health and the health of their children. They cited a variety of effects reported in certain studies, and questioned whether BPA had sufficiently taken some studies into account in its reporting of the issue in the draft EIS. In addition to questions about the potential for biological and electrical effects on their health, individuals expressed the opinion that BPA has treated their concern with "callous disregard" and "indifference to our well-being." If BPA were conveying its facts and opinions on biological and electrical effects accurately, then the agency "should be willing to post a bond quaranteeing that there will be no ill effects on human and animal life from these lines. They should also be willing to accept liability for any ensuing problems and begin studies immediately . . . " by a non-BPA, impartial scientific organization. Concern was also expressed for the potential noise produced by the electrical field, particularly in bad weather: ". . . you state the noise effects to the line can be compared with light city traffic noises. I live in the country by choice. I don't want to hear light city traffic noises in my backyard." Finally, concern was raised with regard to BPA's understanding of the fire danger potential in the Rattlesnake area.

Esthetics concerns took two forms: concern for the effects on people everyday, should the line run near communities, and concern for the overall beauty of the Montana environment. "My biggest concern, however, in this whole issue is for the continuing integrity and beauty of Western Montana landscapes. Power lines are ugly, and that's all you can say about them. As a skier, mountain climber, fisherman and general outdoor enthusiast, I am physically sickened by the concept of more power lines through our Western Montana landscapes." On the other hand, when it came to a choice between placing the lines through more pristine landscapes or closer to urban or residential areas, considerable feeling was expressed that the line should be placed as far away from people as possible: "We all love the back country. No one can possibly be more of an environmentalist about the backwoods than myself, but when we must choose between ourselves, our children, our homes, and our farmland and the backwoods, I have to say, put it back, way back."

Much support was expressed for the technique of undergrounding the line near people or communities to mitigate potential health effects and to improve the appearance of the facilities. (Two lengthy presentations on the need for undergrounding in the Rattlesnake and/or Miller Creek/Lolo area were duplicated in the Lolo meeting, and are covered in that section. The gist of the presentation was that the social, environmental, and long-term health effects of the line in these areas far outweighed the cost or technical problems associated with undergrounding.) Again, the emphasis was on the idea that the line should be kept as far away from people as possible and, if not by line location, then by placing the line out-of-sight by undergrounding.

Not building the line (No Action alternative) received support for two different reasons. First, the need for the line and for the power was questioned by several, particularly in the light of the recent WPPSS shutdowns of nuclear plants in the state of Washington. The speakers saw no benefit coming to Montana from the lines, and all the power being sent to a state that was not completing its own energy facilities. Second, speakers from the Clark Fork Protective Basin Association suggested that "the environmental and social impacts from this line will be great, and that BPA will be unable to mitigate most of them. . .that (these costs) far outweign the costs of not building the line."

A few speakers expressed concern as well about the future plans for the corridor through which this line would pass. One speaker felt that BPA ought to specify what the "saturation level" of lines per corridor should be, in the EIS: "I would hope that BPA would saturate the lower Clark Fork Corridor before they go and place a brand-new corridor west from Missoula across the mountains into Idaho and into Spokane when there still is room on the Clark Fork Corridor by BPA's own admission to put this line." A more general concern expressed a need for more knowledge as to "how many thousand miles (of line) are going to be in Western Montana and where it ends . . . . what is planned for the future in Western Montana."

Numerous concerns were expressed over the EIS itself and the studies that supported it. In addition to questions (addressed earlier) about the health and safety studies, people questioned the socioeconomic interview process which portrayed residents' views in a number of communities. One individual questioned the accuracy of the geology and soils data and the maps from which they were taken. Also questioned was whether the "environmentally preferred" Taft route, so designated in the draft EIS, could in fact be the best route environmentally when it opened up more new corridor and cost more to build. One individual asserted that it was only the "politically preferred" route. Disagreement with the scope of the EIS was mentioned in a concern over possible "segmentation " of the study: shouldn't the study have included the line between Townsend and Garrison, to the east, within its scope? One Garrison-Spokane EIS Wgl363:02-07-83

individual felt that the public meetings held by BPA should have been postponed until after the Montana State Board of Natural Resources and Conservation had met to discuss the route. A few people also wanted to see direct comparison of the routes proposed by BPA with the state-approved (1979) route which was studied in an earlier (Federal Colstrip) EIS, including closer examination of the route running farther north through the Jocko Pass and onto the Flathead Indian Reservation.

Economic impacts of particular concern included property devaluation and tax loss. The Clark Fork Basin Protective Association commented that they held that "decreased property values that is near this transmission route is a quantifiable cost of the project," and that BPA should not only include this in calculating the system costs of the Colstrip Project, but that "the owners of such property whose appraisals have dropped as a result of the line (should) be reimbursed by BPA." Concern was expressed for property devaluation not only of the property over which a right-of-way might pass, but also of property adjacent to the right-of-way. Such devaluation would have consequences as well for the tax base of Missoula County, which would already be foregoing taxes anticipated from the line if it had been built by Montana Power Company. Instead, a Federal entity would be building the line and, as a consequence of its status, paying no taxes.

Finally, specific concern was expressed for the Rattlesnake area just north of Missoula. A representative of the Board of the Friends of the Rattlesnake (FOR) agreed with the BPA findings of significant impact in the Rattlesnake area, but felt that the EIS had not gone far enough in estimating the severity of effects. They further felt that either of the two potential alternatives through the Rattlesnake was unacceptable. The route closer to a residential development would have strong negative visual effects in that area. The route farther north, running through the Rattlesnake National Recreation Area, would have "the worst impact on the natural environment and on the numerous people who enjoy that environment." In addition, proper fire control measures would involve additional timber cutting and marking of lines, which would only increase the visual effects in a sensitive area. Also mentioned were high impacts on water resources, on high recreational user intensity in the area, and on critical elk and mule deer winter range, which the FOR felt were underestimated or not taken into account in the EIS.

## F. DRUMMOND, MONTANA

April 20, 1982

At the very well-attended meeting at Drunmond, over twenty-five people spoke to enter comments into the record; numerous others listened or asked questions of the team. Considerable concern was expressed for the potential effects of the line on agriculture in this neavily agricultural area: "...agricultural land is being withdrawn from production at an alarming rate for subdivisions, roads, power corridors and the like and this practice must stop or we'll be in trouble trying to provide food for our tables."

Related concerns of particular interest were the effects of the line on property value, particularly where the landowner had worked a farm for many years and did not want to sell the land or the rights. ("We are deeply concerned with what this transmission line would do in depreciating land values, especially irrigated meadow lands. . . . Most of the people with the better irrigated ranches have spent a lifetime of work and savings to put them together and for Bonneville to come along and cut the value . . . and render it unusable is absolutely cruel and unjust.") As Drummond is located in the valley through which the existing right-of-way runs, concern was also expressed on the issue of locating the line on public land--that is, back farther into the mountains where Forest Service or BLM land might be found--rather than in the valleys, where private land is concentrated. (Numerous people already have the existing line, a gas line, a telephone line, and/or a Montana Power line through their ranches or residential property.) One individual noted that in the EIS map volume there were sections on many animals but. . ". no maps of human population density. You almost get to feeling that trees, wildlife and public lands designate the areas through which the lines will not be built. " Although the speakers frequently expressed the wish not to "put it on their neighbors," a preference for locating the line further south, on public lands, was expressed several times.

A third concern was the effect that the lines might have on the safety and well-being of the residents and their livestock, both from identifiable hazards such as shock potential and from perceived hazards such as the potential for health effects. Concerns were expressed not only for such health effects on the residents' livestock, but also on the reputation and saleability of that stock should it, as a consequence, be considered suspect. Questions were raised as to the extent and validity of BPA's health effects studies and as to the degree of responsibility BPA would assume should any later health effects be demonstrated.

Several individuals raised the question of need for line and need for the power, in light of recent decisions to close down planned nuclear plant building in the State of Washington. Concern was also raised over the potential for future parallel lines which might take up still more land in the valley.

Several people from Gold Creek were also present at the meeting, and expressed considerable concern that, from their point of view, the decisionmaking had been segmented, that while the location of the (Garrison) substation near Gold Creek had been a difficult enough pill to swallow, now they were faced with the prospect of that substation acting as a magnet for future lines and with the problem of trying to select the "least undesirable" alternative line west from that substation.

Some concerns were also expressed over higher erosion potential in the "northern" alternative, over noise, over potential TV and radio interference from the line, and over possible hazards to aircraft should the line be located near the Drummond airport. Particular concern was expressed over interference with a translator station serving the Hall to New Chicago and Drummond area.

Garrison-Spokane EIS Wgl363:02-07-83

Technical questions were raised on the potential impacts of the lines on irrigation systems (with regard both to inconvenience and hazard) and on the degree of line loss (loss of power from the line) between Garrison and Spokane.

Concerns were raised about future plans for building--such as a second parallel line which might require still more land in the valley--and about the potential for conversion of the line to d.c. power.

### G. LOLO, MONTANA April 21, 1982

At the Lolo meeting of April 21, twelve people spoke to enter their comments officially into the record; several others asked questions as well. Primary concerns were: need for the line; concern for esthetics and the potential for undergrounding as mitigation for esthetic impacts; concern for the potential health and safety effects of transmission lines; and concern for potential depreciation of property values in the Lolo/Miller Creek area. Concern was also expressed at the beginning that inadequate notice of the meeting had been given to the public. Four individuals left the meeting in protest, although two of them returned to give testimony.

A few people were very concerned over the relatively small size of the audience and ascribed that size to a lack of public notification. A request was made to hold another meeting at a later date. Copies of the meeting notice from the local papers and documentation on the extent of media advertisement were made available to the audience.

Several individuals questioned the need for the line, as it related to the need for additional power. Citing new efforts at conservation that nad reduced load forecasts for the future and the recent decisions to shut down construction on the WPPSS nuclear plants in Washington, they felt that no new power was going to be needed and that therefore no line would be needed. Two individuals also raised the possibility of using existing 230-kV lines to carry the power, noting that the double-circuit nature of the proposed project was designed to serve as a backup in the event of line failure.

Two speakers expressed particular concern for visual and other impacts from the line as it would come down Cahoot Canyon and pass down into the valley, crossing the Bitterroot River. Visual impacts would affect the Rodeo Ranchette development, as well as the residents of the Miller Creek area and residents of Lolo, and travellers driving from Missoula down Highway 93 ("Now, as soon as it exits the mouth of the canyon, many thousands of people will suffer visual impacts. Eleven thousand a day is the traffic count on the highway near Lolo, and add to that everyone in Rodeo Ranchettes and Miller Creek Valley, including the proposed subdivision, and you have eleven thousand three hundred and twenty a month. . . Three miles of towers will be seen going uphill west of the Bitterroot River. BPA's orange marker high on the hill north of Cahoot Canyon can be seen from Southwest Missoula and Lolo and beyond. If the tower is placed there, it will be skylighted for miles."). Very strong approval was expressed for the idea of burying (undergrounding) the line in this area by these and other speakers, as a means to mitigate the visual impacts of the line. The cost of burying the line, derived by the speakers from BPA estimates and divided among estimated ratepayers, amounted to \$1.50 per year per ratepayer, according to the speakers. They felt that this cost was relatively small, compared to the social and visual costs of having the line above ground and visible in this attractive area. ("The appendix (E) states that the undergrounding reduces health and safety effects . . . and drastically reduces the visual impacts of the line, plus states that the temporary impacts are preferable to the long-term visual, aesthetic, social, and possible health effects of an overhead line on residential areas."). One speaker also held that reliability was not a significant factor compared to the impacts of keeping the line above ground in this area.

Health effects were a concern of several speakers, who questioned not only the unknown potential for such long-term effects from the line, but also BPA's willingness to be responsible for such effects, should they occur.

Other concerns raised at this meeting included the propriety of holding the public meetings when the issue of BPA compliance with the State Facility Siting Act had not yet been resolved; the concern for potential property devaluation outside the right-of-way; and the concern for benefits seemingly destined for Washington residents who would return no benefits to the residents of Montana. Concern was also expressed for the bald eagles in the Bitterroot area and the potential for disturbing or harming them, and for the potential impacts on agricultural land in the area.

### H. PHILIPSBURG, MT

April 22, 1982

The twenty-eight people who commented on the draft EIS at the Philipsburg, Montana meeting included representatives from the U.S. Senate and one Congressional office, and the Granite County Alliance. In addition, several other residents from the Maxville, Hall, and other places in western Montana spoke at the Philipsburg meeting.

The representatives from the Senate and Congressional offices presented the positions of the Senators and Congressman on several different areas of controversy. The members of the Granite County Alliance recommended that BPA study an alternate route south of Maxville (Corridor "E") and expressed their concern about a wide range of issues, which included compensation for easements, need for the line, property devaluation, undergrounding, and the possibility of using other rights-of-way for the line.

Numerous other local residents supported the position of the Granite County Alliance and also expressed concern about the types of impacts noted above.

The statements by one of the U.S. Senate representatives expressed concern about the segmentation of the project at Carrison, as it could prejudice the route decision westward, about BPA's tax-exempt status, and assured local residents that "I'm sure that all members of the delegation are going to be Garrison-Spokane EIS Wg1363:02-07-83

working to see that those impact payments are adequate to meet impacts of the construction of this line." The statement by the Congressional representative touched on similar issues but focused on the Taft route near Maxville and urged BPA to be responsive to public input and consider the route alternative south of Maxville.

The representative of the Granite County Commissioners stated that the draft EIS had not adequately covered BPA's decision to take over the construction of the line from the Montana Power Company; he also expressed concern about the Taft route being paralleled by future lines.

The Granite County Alliance presented a membership list of "individuals that wish to go on public record as making the following statements which are given on behalf of the Alliance." The alliance also requested that "all comments submitted during the comment period be fully considered and reproduced in their entirety in the final EIS." The Granite County Alliance's presentation described the community of Maxville and stated the community had been largely excluded in the draft EIS and the route ranking process. The presentation objected to many of the evaluation criteria used in the route selection process and questioned the accuracy of several maps in the draft EIS, which had either omitted or not clearly printed the community of Maxville. Members of the alliance went on to state that BPA had not provided adequate notice to landowners and residents who could be affected by the Taft route or involved them in the route identification or selective processes.

The Granite County Alliance proposed an alternative to the Taft route, Corridor E, which would run between Maxville and Philipsburg. They stated that Corridor E was preferable over the least-impact Taft route because it would: avoid more residences and private land, avoid more agricultural land, reduce hydrology, wildlife, forestry, recreational, geology/soils, and cultural resource impacts.

As noted above, many of the speakers at the Philipsburg meeting provided more evidence and detail to support the Granite County Alliance's proposal for Corridor E. In addition, they also addressed several other controversial issues.

Several speakers urged BPA to cooperate with local landowners in locating roads and towers. They also made several strong statements about compensation for easements: "Property devaluation, loss of agricultural productivity, loss of flexibility of mining operations and esthetic impact are examples of the other factors which must be considered in determining adequate compensation."

Other speakers questioned the need for the project, stating that actual load projections are well below their projected levels. These speakers concluded that because of a lack of demonstrated need, the No Action alternative was preferable from both environmental and cost perspectives.

Several speakers expressed concern about the line's effects on property values, one stating: "We do not have the urban amenities such as proximity to stores, restaurants, theaters, et cetera. Rather, what we have is scenic beauty, unspoiled country untouched by the hand of man and peace and quiet. The powerline would destroy all of these precious values.

Other speakers asked questions about the feasibility of undergrounding the line, about restrictions it might place on blasting and other mining operations, and about the possibility of using an existing right-of-way between Hall and Drummond for the line.

### I. FRENCHTOWN, MONTANA April 26, 1982

Fourteen residents of the Frenchtown area spoke at this meeting to present their concerns and comments on the draft EIS. Primary concerns were over the esthetics impacts of the line; health and safety issues; need for the line and for the power; process and adequacy of the EIS studies and the related public involvement opportunities. Particular concern was also expressed over interference of the line with firefighting techniques.

Concern over the need for the line and the power led numerous speakers to advocate the No Action alternative, as they felt that the need for large, long lines had not been demonstrated and since more local power generation was favored. The recent WPPSS shutdowns were also cited as evidence of no need for the lines. Concern for health and safety effects was also cited as a reason for favoring No Action: "I personally find the transmission lines unwanted, unnecessary, and unhealthy to the environment of all living things, including politicians." The question of who benefits also arose in this connection: "...I can't begin to endorse Colstrip sending power out to Washington and Washington with the nuclear reactors sending their power back here. We are going to have an explosion in the middle and I think we are in the middle."

Health and safety were questions prominently raised, both in terms of effects on humans and on their animals. The feeling was expressed that BPA simply could not allow health effects to become an issue, as lawsuits would be a major problem as a consequence. Questions were raised as to BPA's liability and compensation policies if damage should be proved to have occurred as a result of the lines.

Also under consideration here were the potential hazards to firefighting suggested by the Forest Service Fire Line Handbook. The speaker's conclusion was that ". . . I'm sure that if a fire breaks out in the Tank Creek drainage or in another drainage equally narrow and steep, the firefighters will wisely keep their distance. . . . But then, I guess that means that we might have to watch a fire burn through an entire drainage before it could be manned and controlled. How wide would the swathe be then?"

Concerns for esthetics was both local and state-wide. One Landowner expressed particular concern for the three to four towers, at least one skylined, that would be seen from her residence near the Ninemile interchange looking towards Alberton. She also expressed a larger concern: "The lines will have to be stopped. Not just because the towers would seem ugly to me here, but because of the ugly everywhere. They will cut a swathe all the way across Montana if we allow it, but we won't." Garrison-Spokane EIS Wgl363:02-07-83

Another speaker urged consideration of a route crossing the Bitterroot Valley near Sula to reduce esthetic impacts. Others favored a Sudan route and effective mitigation techniques such as painted towers and undergrounding to minimize effects. Particular concern was expressed for running the line through the Ninemile area or near Alberton where numerous residences would be affected. One speaker expressed approval of the newer location (farther from I-90) of the Taft Substation. Approval was also expressed for the idea of keeping the line out of valley bottoms and agricultural land and locating instead back farther in the hills. This speaker felt that the EIS needed to examine a route through the Jocko Pass, which would cross the Flathead Indian Reservation on the previously state-approved route.

Concern for due process in the studies and decisionmaking and in consideration of public input was raised at this meeting. One speaker questioned whether the EIS process violated National Environmental Policy Act (NEPA) standards and had produced two EIS's where one should have been done (segmentation of the line). Also a concern was whether ordering steel for the Townsend-Garrison line was prejudicing selection of a route for this line. The same speaker wanted a guarantee in the EIS that no future lines would be placed in the corridor selected. He expressed concerns with the environmental criteria and ranking of routes process, suggesting that the results could easily have been reversed. Specifically, he felt that the natural resources received a great deal more consideration than the human environment in the EIS process. The speaker did say that the Taft plan kept "the bulk of the line" out of inhabited areas and that this selection had the effect of reducing long exposure of people to potential health and safety effects.

That speaker's concern with the cost of the line included note of the fact that BPA would pay no taxes on the line as a Federal entity, depriving the residents of the county of revenue. He called for more figures in the EIS on costs to users, and on costs of helicopter construction and maintenance.

Concern was expressed that the public did not get to comment on the economic or engineering considerations that go into deciding on a route. Questions were raised on the nature of the decision process and on how the comments being gathered in these meetings were going to be entered into the accision process. Concern was also expressed that landowners living within one mile of each of the proposed corridors be notified in writing. A few people also asked why no meetings were being held in Huson or Alberton.

### J. SUPERIOR, MONTANA April 27, 1982

Thirty people entered comments or questions into the record at the Superior meeting. Primary concerns were social and economic effects of the line; esthetics impacts; health and safety questions; concerns for the process of EIS studies and decisionmaking; and questions on the need for the line and for the power.

The question of need for the line was related to issues of reduced load forecast and to the idea that since the Garrison-Spokane system was proposed as a "backup", it would be unnecessary while Washington State was shutting down the building of their nuclear plants. Concern was expressed that Montanans were paying for Washington needs: "We have paid enough money for some of the problems and the projects in Washington as it is, and I don't think we should pay either monetarily or through our environment for a line through here that is not needed." Numerous plant closures such as that of the Bunker Hill mine were cited as examples of reduced need which contrasted with the need cited for the Colstrip power.

Strong and repeated concern was expressed several times over the "environmentally preferred" designation of the Taft route, which would pass through Mineral County. Residents could not understand how cutting a new corridor through the land had fewer impacts than paralleling an existing right-of-way: " Of course, the BPA EIS doesn't show us as having the most impact. After all, putting the lines on existing right-of-way adjacent to existing lines is more detrimental than clear-cutting your way across a hundred miles of timber and forest land." One resident also compared previous logging roads that, over a period of twenty years, subsided into the landscape with present roads: "Now, they build these big boulevards and this and that up and down the mountains on every face, and it makes me sick to think another network of roads to service a power line to go along with what we're got and scar up our landscape more . . . "

Residents did not see how BPA could have ignored "the quality of life . . . the quality and type of recreation . . . the hundreds and thousands of vacationers that travel I-90" and instead seem to count social impacts merely by number of people in a few communities. "BPA says the Taft route best avoids environmentally sensitive areas, although it has the most forestry, vegetation, and water resources. Those are their words. I'd like to know what . . . is their definition of environmentally preferred," The Taft route was alleged to be the "politically preferred," not the "environmentally preferred" route. One individual felt that the designation was simply a case of the Rattlesnake area "outgunning" Mineral County.

Several individuals also pointed out that following the existing corridor (Hot Springs Plan) was considerably less expensive and that, in the present state of the economy, and considering that the ratepayers must foot the bill for the line, BPA had an obligation to consider the cost more seriously.

The Mineral County planner presented several issues of concern for the county. He first expressed concern for the effects the line might have on the private/public balance of land in the county and on the county planning process. "Mineral County presently has only twelve percent of its territory in private ownership. The extremely small size of the private land base places a premium on careful land-use planning. The loss of any private land which could be used for agriculture, subdivision, recreational development, commercial use, and/or open space of high esthetic quality will be a severe detriment to the comprehensive planning process in Mineral County, to its residents." This individual also felt that the present EIS process was primarily an attempt to find "the path of least resistance" for future lines which would further disrupt the county.

Other concerns voiced by the planner included: (1) Agriculture concerns (primarily health and safety) had caused the line to be re-routed elsewhere; why not in Mineral County, where agriculture is "critical to the county's economy and geographic character." (2) The line would adversely affect subdivisions in physical or visual proximity to the line, reducing property values, altering development potential, and reducing the tax base in the long-term for the county. (3) Recreation and open space impacts would be caused where the line would cross a mountain zone recognized as an "outstanding natural area" under the Mineral County Recreational Facilities Plan: "The power line will have overwhelming negative effects on these environmental and scenic values." He noted that efforts were under way, in coorperation with State agencies, to acquire the "St. Regis Landing," a peninsula with "outstanding scenic, environmental, and recreational values." The line would pass in plain view of this acquisition. He also noted that the Lolo National Forest Plan characterized the canvon in the cutoff road area as visually important, a designation imperiled by the presence of the tall towers associated with the project. Recreation-oriented businesses could be affected by the line. Animals of interest to hunters--such as deer and elk--would have critical winter and spring range crossed by the line.

The planner also expressed concern for (4) municipal watersheas with sensitive drainage basins which would be crossed by the line; (5) the Keystone-Pardee Historic District" which should have its management "limited to activities that would preserve and restore the historic resources" but which would be approached by the line;  $(\delta)$  mining claims which would be more accessible to the public, thereby increasing the chances of vandalism and increasing the burden on the Sheriff's Department which would already have its load increased by the presence of construction workers and necessary policing of the corridor zone after construction; (7) expenses for county roads damaged by construction; (8) adverse effects on TV and radio reception; and (9) removal of substantial amounts of timber from the right-of-way, reducing future timber receipts and thus tax dollars available to Mineral County. He urged that BPA establish "a reasonable and fair impact aid payments program" if the line were to go through: "Although we can't be bought, we won't be robbed." (Note: the Mineral County Planner's views are excerpted at some length, as his comments articulately represented a number of concerns raised by other individuals at the meeting.)

Concern was expressed by several individuals over the potential health and safety effects of the line, particularly with regard to the studies cited by BPA. People were concerned that the government might tell them that there were no effects now, but would turn out to be wrong later. One individual was concerned that the people living near the future Garrison-Spokane line might turn out to constitute the "long-term study" needed to demonstrate the existence of such effects. Several people raised questions about herbicide use and its potential effects on streams and drinking water.

Compensation by BPA for damages to life or property were also a subject of some question. In particular, questions were asked as to compensation, should a transmission line be implicated in the starting of a forest fire which might

destroy homes and property; and on compensation for any electrical effects which might cause damage to an irrigation system. One individual commented that it seemed as though "every time a government agency has gone through private land around here, their idea of a fair price and the landowner's idea is mighty far apart."

Finally, a petition by the treasurer of Mineral County was presented with 79 signatures. It read: "We, the undersigned residents of Mineral County, are strongly opposed to the placement of the Bonneville Power Administration's 500-kV power line in Mineral County. The negative impacts on land values, tax base, public health and safety, radio and TV reception, agriculture, wildlife, scenic resources and many other factors makes the 'southern route' totally unacceptable to us. Only twelve percent of our county is private land. We simply cannot afford to lose the productive use of a single square foot of private land. The existing power line right-of-way through the Flathead Reservation should be used before any new corridors are taken. Be advised that we are unalterably opposed to the construction of the BPA power line through Mineral County. "

### K. ST. IGNATIUS, MONTANA April 28, 1982

At the St. Ignatius meeting, three speakers entered comments on the EIS into the record. Subjects of concern included health and safety effects, keeping the line away from residences, and need for the line.

Concern was expressed over Bonneville's compliance both with NEPA and with the Montana Major Facility Siting Act. Question was raised as to whether the line had been "segmented" by two studies, thus failing to follow NEPA directives.

Questions were also raised on technical alternatives such as undergrounding the line or the potential for solar or other alternative energy sources eventually replacing the line.

One speaker also raised a variety of other issues: in-lieu-of-tax payments, impact aid for affected areas, maintenance of high esthetic values in the area, and a recommendation that BPA consider a more southerly routing of the line towards Sula to minimize esthetic impacts. He also recommended not building the line.

### L. PLAINS, MONTANA

April 29, 1982

Ten people entered their comments on the draft EIS at the Plains meeting. Although numerous subjects were discussed, the primary focus was on social and economic issues; need for the line and the power, as well as the history of BPA's involvement in the project; corridor development; and the EIS process.

Numerous individuals questioned the planning and data that went into the BPA studies, particularly on need. They felt that the need forecasts used for this project were outdated: "You're making projections which are investing many dollars, you're committing land and resources and you have no reliable,

Garrison-Spokane EIS Wgl363:02-07-83

logical, sound evidence to back this." Suggestions were made that the line not be built, or that the coal be shipped to Washington for conversion to energy. Conservation was also seen as a good alternative to building "unnecessary" facilities.

Considerable concern was expressed by one individual that BPA, and not Montana Power Company, was building this line. He felt that the county was thereby being deprived of taxes which would have helped to compensate for the impacts of the line. One individual pointed out that if Montana Power had asked Bonneville to build the line because it was unable to negotiate with the Indian tribes to cross the Reservation, and since Bonneville's preferred route did not cross the Reservation, that Bonneville should turn the building of the line back over to Montana Power. Concern was also expressed over the adequacy of future corridor planning for this line: "Let's build it right if you're going to build it at all . . . Let's not have seven sets of towers running along the Clark Fork Valley."

Several people were also concerned that Montanans were paying the price for Washington's needs: "You forecast deficits, . . . and (say) hey, Washington, don't build these nuclear plants, you don't really need the power, but here Montana, we're going to . . . build lines over here so Montana Power can make more money at our expense again and you're going to do it not only at the expense of our tax dollars to build the lines, but you're going to do it in the sense that the power lines are going to be publically owned . . and you're not going to pay taxes on it and that's wrong, just flat wrong. "Strong support was expressed for the policy of payments in lieu of taxes by Bonneville.

Esthetic and financial concern was expressed for the economic losses to tourism in Sanders County after the lines had gone through, and for losses sustained by landowners adjacent to the line who would not usually be compensated for esthetic impacts. One commenter recommended that BPA should either locate the line on Federal, not private land, or else buy a landowner out entirely for the right-of-way rather than taking property piecemeal.

Other effects of the line which worried residents were potential health and safety concerns, which included perceived health effects as well. One business owner suggested that his present difficulties in getting his employees to work near the existing lines would be compounded by additional and more imposing lines.

Other social and economic concerns included questions on the long-term demographic impacts, which one individual felt were inadequately treated in the EIS, and on what he felt was a very low estimate of impacts on agricultural land in the area. Questions were also asked as to whether d.c. lines had been considered, which might lessen the esthetic impact to the area. Some individuals expressed concern that BPA live up to its promises after construction, with particular regard to TV and radio interference mitigation and to regrading and subsoiling land disturbed by construction.

### M. POTOMAC, MONTANA

### April 22, 1982

Seven speakers at the Potomac meeting covered a range of concerns. Although no one issue emerged as an outstanding concern, statements did seem to focus on issues of economics, including the potential effect lines might have on property values, the question of taxes lost through a Federal build option, and cost of the line. Some question was also raised on the esthetic effects of the line.

Concern was expressed most often about the financial impact that the building of the line would have on the area. Bonneville was urged to consider implementing the payment in-lieu-of-taxes approach, since Federally built facilities do not pay taxes. Some felt that the tax loss to the county (since no private utility was building these lines) needed to be compensated. One individual noted that the U.S. Forest Service and the Montana Fish and Game Department make a form of payment in-lieu-of-taxes for such impacts.

Numerous questions were asked on the process of appraisal of lands, survey permissions, and acquisition policies. A few individuals were concerned that the power was being sent to a state that was in the process of cancelling its own energy projects (WPPSS nuclear plants) and that for Montana to "pay the price" of the lines for the benefit of Washington State was not appropriate. Other questions on policy covered building and maintenance of access roads and the effects these might have on landowners.

Two inquiries on line location were received: one individual questioned whether a route passing farther north and then through the Jocko Pass onto the Flathead Indian Reservation was being considered. Another individual requested consideration of a route farther south of Potomac to decrease potential esthetic impacts on the area.

### N. THOMPSON FALLS, MONTANA May 3, 1982

At the Thompson Falls meeting, fourteen people spoke and asked questions. The questions and comments addressed a variety of topics and issues. Among the most common were: history of the project; corridor development/future planning; use of existing vs. new right-of-way; need for the line; and BPA's public involvement and route selection processes. In terms of resource-specific impacts, people expressed the most concern about the project's potential economic, health/safety, and social effects.

The comments on corridor development recommended that "more careful planning go into determining where the remainder of these proposed future Colstrip transmission lines will be located. "The questions on this topic were primarily concerned with the use of the corridor after the line is no longer needed. Garrison-Spokane EIS Wgl363:02-07-83

The speakers who addressed the history of the project proposed a number of reasons why they thought BPA had assumed responsibility for constructing the line. Among these were Montana Power's inability to negotiate a right-of-way across the Flathead Indian Reservation, a desire by MPC to have the project built without tax liabilities to local counties, and simply because it was needed by businesses and residents in the Pacific Northwest.

Several speakers questioned the need for the power and the line. Their attitude is best reflected in the words of one speaker, who stated "Why don't you go back and think it over and consider doing it right instead of just blundering ahead from a wrong decision." Other comments on need noted industry and nuclear plant snutdowns, saying that recent declines in the need for power meant that a reevaluation of the need for the project should be undertaken.

A few speakers expressed concern about BPA complying with the Montana State Major Facility Siting At, but most of the discussion on legal issues focused on BPA's right to build a transmission line in western Montana and on BPA's position as a profit-generating agency for the Federal government: " . . . your activities net the Federal government many millions of dollars each year. This is a violation of the provisions of your organization, which states that the rates would be paid for at such a rate as to make even . . .."

Several speakers at the Thompson Falls meeting noted that the Clark Fork Valley between Thompson Falls and Plains was already "full" of energy and transportation corridors. As one speaker suggested: "This valley right today is so cluttered up with power lines and pipelines, railroads, dams, now it is getting to the point it isn't hardly fit to live in any more." Many felt that an additional line would, therefore, have a devastating effect on a particular piece of property or simply that the line should go somewhere else because the Clark Fork Valley was full.

When addressing the potential impacts of the project, the Thompson Falls residents expressed the greatest corcern about the line's social, economic, esthetic, and biological effects on people. The concern about social effects pertained mainly to the potential use of eminent domain and to the effects the project could have on future generations of local residents. As one resident put it: "We are landowners who are possibly facing a new power line going through our land. This is not just our land. This is land which will be passed on to our children. This affects not only our lives; it affects a long, long time."

The comments on economic inputs touched on a variety of resource areas. Two of the comments stated that BPA should maximize the employment or local people on the project by hiring local constructon contractors. Other comments highlighted the importance of the tourist industry to Sanders County and stated that the line's presence would make it a less desirable destination for tourists, vacationers, hunters, and fishermen. The Thompson Falls area comments on economic effects on agriculture related primarily to inconvenience of farming around the lines and the feeling that instead of a one-time payment and a lifetime problem, these sites ought to be compensated on an annual lease basis. The speakers at the meeting also demonstrated concern about another type of economic issues, property devaluation. They were virtually certain that property would be devalued because of the line and requested BPA to consider buying affected parcels outright or to make annual instead of one-time payments for easements.

The speakers also showed great concern about BPA's tax-exempt status and the revenues it would not be contributing to local counties. Most of the comments considered the revenues foregone to be a "tax loss": We feel that the line, if it is needed, should be built by private enterprise. This would give the county a tax base." Several of the speakers encouraged BPA to make payments in-lieu-of-taxes.

Comments on visual effects cited the unpleasantness of existing transmission lines in the area and reiterated how undesirable more towers and lines would be. The speakers who made comments on the line's potential health and safety effects were concerned with the line's long-term biological effects and expressed their desire to see more research carried out on the subject. However, they also expressed great concern about children becoming trapped against electrically charged metal objects and about the wearers of pacemakers. As one resident noted: "Certainly no one is going to check their pacemaker just simply so they can buy property near a power line. This greatly limits the housing and recreational opportunities of these people."

And, finally, speakers at the Thompson Falls meeting were very concerned about the public involvement and decision-making processes being used to site the project. One comment summarized the overall feeling: "You are pitting neighbor against neighbor, county against county to try to get this powerline project pushed off onto someone else." Other comments expressed a desire to have the decisionmakers present at the hearing and to make sure that the decisionmakers were exposed to the public's comments in their entirety. The comments on process/methodology questioned the weighting of the different resource areas in reaching a site selection and expressed general sentiment that the routes through Sanders County were "politically preferred" rather than environmentally preferred.

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# **Comment Letters**

### INDEX OF COMMENT LETTERS

### Garrison-Spokane

## INDIVIDUAL/ORGANIZATION

DATED

PAGE

| Undated         Marjorie Harper, Clark Fork Basin           Protective Association         VI-1           Undated         Wendall Beardsley         VI-4           Jun 16, 1981         John E. Stenger         VI-5           Undated         Rick Nash         VI-7           Jun 22, 1981         Donna Wilson         VI-7           Jun 23, 1981         Peter A. Philips, M.D.         VI-7           Jun 24, 1981         Jonette R. Zulauf         VI-9           Aug 9, 1981         Jonette R. Zulauf         VI-9           Aug 9, 1981         Jonette R. Zulauf         VI-9           Aug 11, 1981         Ed Coffman, Clark Fork Basin         VI-10           Sep 17, 1981         Albert Borgmann         VI-11           Sep 17, 1981         Albert Borgmann         VI-12           Oct 19, 1981         Albert Borgmann         VI-16           Oct 27, 1981         Viola M. Gratter         VI-16           Oct 28, 1981         Marie Morrison         VI-17           Oct 29, 1981         Allen A. Morrison         VI-17           Oct 29, 1981         Allen A. Morrison         VI-18           Nov 14, 1981         June & Ralph Piccinini         VI-20           Undated         Lorene K. McCoy  | Protective AssociationVI-1UndatedWendall BeardsleyVI-4Jun 16, 1981John E. StengerVI-5 | 4<br>5<br>6<br>7 |
|---|---|------------------|
| Undated         Wendall Beardsley         VI-4           Jun 16, 1981         John E. Stenger         VI-5           Undated         Rick Nash         VI-7           Jun 23, 1981         Donna Wilson         VI-7           Jun 23, 1981         Peter A. Philips, M.D.         VI-7           Jun 23, 1981         Jonette R. Zulauf         VI-9           Aug 9, 1981         Jonette R. Zulauf         VI-9           Aug 11, 1981         Ed Coffman, Clark Fork Basin         VI-11           Oct 12, 1981         Abert Borgmann         VI-11           Oct 12, 1981         Abert Borgmann         VI-12           Oct 13, 1981         Elmer and Eleanor Lachenmaier         VI-15           Oct 27, 1981         Viola M. Gratter         VI-16           Oct 29, 1981         Marie Morrison         VI-17           Oct 30, 1981         Russell F. Morrison         VI-18           Nov 14, 1981         June & Ralph Piccinini         VI-20           Nov 17, 1981         Marc & Gratter         VI-20           Nov 14, 1981         June & Kalph Piccinini         VI-20           Nov 17, 1981         Marc & Gratter         VI-20           Nov 17, 1981         Beverly J. Skinner         VI-20           <  | UndatedWendall BeardsleyVI-4Jun 16, 1981John E. StengerVI-5                           | 5<br>6<br>7      |
| Undated         Fick Nash         VI-6           Jun 22, 1981         Donna Wilson         VI-7           Jun 23, 1981         Peter A. Philips, M.D.         VI-7           Jun 10, 1981         Allie L. Jensen         VI-8           Aug 9, 1981         Jonette R. Zulauf         VI-9           Aug 11, 1981         Ed Coffman, Clark Fork Basin         VI-10           Aug 11, 1981         Bouglas R. Austin         VI-11           Sep 17, 1981         Albert Borgmann         VI-12           Oct 19, 1981         Albert Borgmann         VI-12           Oct 15, 1981         Elmer and Eleanor Lachenmaier         VI-15           Oct 26, 1981         Mary Faye Conn         VI-16           Oct 29, 1981         Allen A. Morrison         VI-17           Oct 30, 1981         Russell F. Morrison         VI-18           Nov 2, 1981         Marie B. Wickberg         VI-20           Nov 17, 1981         Mrs. Carl L. Cassidy         VI-20           Nov 17, 1981         Mers Carl L. Cassidy         VI-21           Undated         Lorene K. McCoy         VI-22           Nov 17, 1981         Mary J. Sinner         VI-22           Undated         Corolyn G., Sam W., Bill Dennis         VI-23   |   | 6<br>7           |
| Undated         Rick Nash         VI-6           Jun 22, 1981         Donna Wilson         VI-7           Jun 23, 1981         Peter A. Philips, M.D.         VI-7           Jul 10, 1981         Allie L. Jensen         VI-8           Aug 9, 1981         Jonette R. Zulauf         VI-9           Aug 11, 1981         Ed Coffman, Clark Fork Basin         VI-10           Aug 18, 1981         Douglas R. Austin         VI-11           Oct 12, 1981         Albert Borgmann         VI-12           Oct 19, 1981         Albert Borgmann         VI-12           Oct 27, 1981         Male Korsion         VI-15           Oct 26, 1981         Mary Faye Conn         VI-16           Oct 29, 1981         Allen A. Morrison         VI-17           Oct 30, 1981         Russell F. Morrison         VI-18           Nov 2, 1981         Marie B. Wickberg         VI-20           Undated         Lorene K. McCoy         VI-20           Undated         Rom Peterson         VI-21           Undated         Gary A. Morrison         VI-22           Undated         Rom Peterson         VI-22           Undated         Rom Peterson         VI-22           Undated         Rory A. Morrison   |   | 7                |
| Jun 23, 1981         Peter A. Philips, M.D.         VI-7           Jul 10, 1981         Allie L. Jensen         VI-9           Aug 9, 1981         Jonette R. Zulauf         VI-9           Aug 11, 1981         Ed Coffman, Clark Fork Basin         VI-10           Aug 18, 1981         Douglas R. Austin         VI-11           Aug 18, 1981         Douglas R. Austin         VI-11           Oct 12, 1981         Albert Borgmann         VI-12           Oct 19, 1981         Albert Borgmann         VI-12           Oct 27, 1981         Viola M. Gratter         VI-15           Oct 26, 1981         Marg Faye Conn         VI-16           Oct 29, 1981         Malten A. Morrison         VI-17           Oct 29, 1981         Malten A. Morrison         VI-17           Oct 29, 1981         Marie Korrison         VI-17           Ovo 17, 1981         Marie B. Wickberg         VI-80           Nov 14, 1981         June & Ralph Piccinini         VI-20           Nov 17, 1981         Mars. Carl L. Cassidy         VI-21           Undated         Lorene K. McCoy         VI-22           Dec 6, 1981         Mary D. Lipski         VI-22           Undated         Corolyn G., Sam W., Bill Dennis         VI-23                                    | Undated Rick Nash VI-6  |                  |
| Jul 10, 1981       Allie L. Jensen       VI-8         Aug 9, 1981       Jonette R. Zulauf       VI-9         Aug 11, 1981       Ed Coffman, Clark Fork Basin       VI-10         Aug 18, 1981       Douglas R. Austin       VI-11         Sep 17, 1981       Albert Borgmann       VI-12         Oct 19, 1981       Albert Borgmann       VI-12         Oct 19, 1981       Albert Borgmann       VI-14         Oct 27, 1981       Viola M. Gratter       VI-15         Oct 29, 1981       Mare Horrison       VI-16         Oct 29, 1981       Marie Morrison       VI-17         Oct 30, 1981       Russell F. Morrison       VI-18         Nov 14, 1981       June & Ralph Piccinini       VI-20         Nov 14, 1981       June & Ralph Piccinini       VI-20         Nov 17, 1981       Beverly J. Skinner       VI-20         Nov 17, 1981       Beverly J. Skinner       VI-20         Undated       Lorene K. McCoy       VI-22         Dec 6, 1981       Mary D. Lipski       VI-22         Undated       Cass Chinske, Friends of the Rattlesnake       VI-22         Jun 14, 1982       Missoula City-County Health Dept<br>Phillip C. Tourangeau       VI-28         Jan 14, 1982       James E. & Gra   | Jun 22, 1981 Donna Wilson VI-   | 7                |
| Aug         9, 1981         Jonette R. Zulauf         VI-9           Aug         11, 1981         Ed Coffman, Clark Fork Basin         VI-10           Aug         18, 1981         Douglas R. Austin         VI-11           Sep         17, 1981         Albert Borgmann         VI-11           Oct 12, 1981         Adele Furby         VI-12         Oct 10, 1981           Oct 13, 1981         Albert Borgmann         VI-12           Oct 15, 1981         Elmer and Eleanor Lachenmaier         VI-15           Oct 27, 1981         Viola M. Gratter         VI-16           Oct 29, 1981         Marie Morrison         VI-17           Oct 29, 1981         Marie Morrison         VI-18           Nov 2, 1981         Marie B. Wickberg         VI-18           Nov 14, 1981         June & Ralph Piccinini         VI-20           Nov 17, 1981         Beverly J. Skinner         VI-20           Undated         Lorene K. McCoy         VI-22           Undated         Lorene K. McCoy         VI-22           Dec 6, 1981         Mary D. Lipski         VI-28           Jan 14, 1982         Missoula City-County Health Dept<br>Phillip C. Tourangeau         VI-28           Jan 14, 1982         Jamese E. & Grace Maeh1         VI-                   | oun 25, 1961  |                  |
| Index         Instruction         VI-10           Aug 11, 1981         Ed Coffman, Clark Fork Basin         VI-10           Aug 18, 1981         Douglas R. Austin         VI-11           Aug 12, 1981         Albert Borgmann         VI-11           Oct 12, 1981         Adele Furby         VI-12           Oct 19, 1981         Albert Borgmann         VI-12           Oct 19, 1981         Albert Borgmann         VI-14           Oct 27, 1981         Viola M. Gratter         VI-15           Oct 26, 1981         Mary Faye Conn         VI-16           Oct 29, 1981         Allen A. Morrison         VI-17           Oct 30, 1981         Russell F. Morrison         VI-18           Nov 2, 1981         Marie B. Wickberg         VI-18           Nov 14, 1981         June & Ralph Piccinini         VI-20           Nov 17, 1981         Mrs. Carl L. Cassidy         VI-21           Undated         Lorene K. McCoy         VI-21           Undated         Lorene K. McCoy         VI-21           Undated         Gary A. Morrison         VI-21           Undated         Gary A. Morrison         VI-21           Undated         Mervin 0. Eriksson         VI-21           Undated         Merv  |   | 8                |
| Protective Association         VI-10           Aug 18, 1981         Douglas R. Austin         VI-11           Sep 17, 1981         Albert Borgmann         VI-11           Oct 12, 1981         Adele Furby         VI-12           Oct 15, 1981         Albert Borgmann         VI-14           Oct 27, 1981         Viola M. Gratter         VI-15           Oct 26, 1981         Mary Faye Conn         VI-16           Oct 29, 1981         Marie Morrison         VI-17           Oct 29, 1981         Marie Morrison         VI-17           Oct 29, 1981         Marie B. Wickberg         VI-18           Nov 2, 1981         Marie B. Wickberg         VI-18           Nov 14, 1981         June & Ralph Piccinini         VI-20           Undated         Laura L. Palmer         VI-21           Undated         Lorene K. McCoy         VI-21           Undated         Gary A. Morrison         VI-22           Undated         Gary A. Morrison         VI-23           Dec 6, 1981         Gary A. Morrison         VI-21           Undated         Lorene K. McCoy         VI-22           Undated         Corolyn G., Sam W., Bill Dennis         VI-22           Undated         Gorolyn G., Sam W., Bill Dennis<   | Aug 9, 1981 Jonette R. Zulauf VI-9  | 9                |
| Aug 18, 1981       Douglas R. Austin       VI-11         Sep 17, 1981       Albert Borgmann       VI-11         Oct 12, 1981       Adele Furby       VI-12         Oct 19, 1981       Albert Borgmann       VI-14         Oct 15, 1981       Elmer and Eleanor Lachenmaier       VI-15         Oct 27, 1981       Viola M. Gratter       VI-15         Oct 26, 1981       Mary Faye Conn       VI-16         Oct 29, 1981       Allen A. Morrison       VI-17         Oct 30, 1981       Russell F. Morrison       VI-18         Nov 2, 1981       Marie Morrison       VI-18         Nov 17, 1981       Mrs. Carl L. Cassidy       VI-20         Nov 17, 1981       Beverly J. Skinner       VI-20         Undated       Lorene K. McCoy       VI-21         Undated       Lorene K. McCoy       VI-21         Undated       Gary A. Morrison       VI-21         Undated       Mervin O. Eriksson       VI-27         Dec 6, 1981       Gary A. Morrison       VI-27         Undated       Corolyn G., Sam W., Bill Dennis       VI-28         Jan 14, 1982       Missoula City-County Health Dept       VI-30         Dar 14, 1982       James E. & Grace Maehl       VI-29  | Aug 11, 1981 Ed Coffman, Clark Fork Basin   |                  |
| Hag 10, 10, 10, 10, 10, 10, 10, 10, 10, 10,   |   |                  |
| Oct 12, 1981         Adele Furby         VI-12           Oct 13, 1981         Albert Borgmann         VI-14           Oct 15, 1981         Elmer and Eleanor Lachenmaier         VI-15           Oct 27, 1981         Viola M. Gratter         VI-15           Oct 29, 1981         Mary Faye Conn         VI-16           Oct 29, 1981         Marie Morrison         VI-17           Oct 30, 1981         Russell F. Morrison         VI-18           Nov 2, 1981         Marie B. Wickberg         VI-18           Nov 14, 1981         June & Ralph Piccinini         VI-20           Nov 17, 1981         Mrs. Carl L. Cassidy         VI-21           Undated         Lorene K. McCoy         VI-21           Undated         Lorene K. McCoy         VI-21           Undated         Lorene K. McCoy         VI-22           Dec 6, 1981         Mary D. Lipski         VI-25           Undated         Mervin 0. Eriksson         VI-27           Dec 8, 1981         Cass Chinske, Friends of the Rattlesnake         VI-28           Jan 14, 1982         Missoula City-County Health Dept         Phillip C. Tourangeau         VI-28           Jan 15, 1982         James E. & Grace Maehl         VI-29         Jan 14, 1982         Missoula City-County Health | Aug 18, 1981 Douglas R. Austin VI-  | 11               |
| Oct 19, 1981       Albert Borgmann       VI-14         Oct 15, 1981       Elmer and Eleanor Lachenmaier       VI-15         Oct 27, 1981       Viola M. Gratter       VI-15         Oct 26, 1981       Mary Faye Conn       VI-16         Oct 29, 1981       Marie Morrison       VI-17         Oct 29, 1981       Allen A. Morrison       VI-17         Oct 30, 1981       Russell F. Morrison       VI-18         Nov 2, 1981       Marie B. Wickberg       VI-18         Nov 14, 1981       June & Ralph Piccinini       VI-20         Nov 17, 1981       Mrs. Carl L. Cassidy       VI-21         Undated       Laura L. Palmer       VI-21         Undated       Lorene K. McCoy       VI-22         Dec 6, 1981       Gary A. Morrison       VI-22         Dec 6, 1981       Gary A. Morrison       VI-23         Undated       Mervin 0. Eriksson       VI-27         Dec 21, 1981       Honorable Pat Williams       VI-27         Undated       Corolyn G., Sam W., Bill Dennis       VI-28         Jan 14, 1982       James E. & Grace Maehl       VI-29         Jan 15, 1982       James E. & Grace Maehl       VI-30         Jan 25, 1982       Clayton R. Herron       VI-31   | 5 cp 17, 1901   |                  |
| Oct 15, 1981       Elmer and Eleanor Lachenmaier       VI-15         Oct 27, 1981       Viola M. Gratter       VI-15         Oct 26, 1981       Mary Faye Conn       VI-16         Oct 29, 1981       Marie Morrison       VI-17         Oct 30, 1981       Russell F. Morrison       VI-17         Oct 30, 1981       Russell F. Morrison       VI-17         Oct 30, 1981       Marie B. Wickberg       VI-18         Nov 2, 1981       Marie B. Wickberg       VI-18         Nov 14, 1981       June & Ralph Piccinini       VI-20         Nov 17, 1981       Mrs. Carl L. Cassidy       VI-20         Nov 17, 1981       Beverly J. Skinner       VI-20         Undated       Laura L. Palmer       VI-21         Undated       Ron Peterson       VI-21         Undated       Ron Peterson       VI-22         Dec 6, 1981       Gary A. Morrison       VI-22         Dec 6, 1981       Gary A. Morrison       VI-22         Undated       Mervin 0. Eriksson       VI-27         Dec 8, 1981       Cass Chinske, Friends of the Rattlesnake       VI-28         Jan 14, 1982       Missoula City-County Health Dept<br>Phillip C. Tourangeau       VI-28         Jan 15, 1982       James E. & Grace Maehl<   | ······································  |                  |
| Oct 27, 1981       Viola M. Gratter       VI-15         Oct 26, 1981       Mary Faye Conn       VI-16         Oct 29, 1981       Male Morrison       VI-17         Oct 29, 1981       Allen A. Morrison       VI-17         Oct 30, 1981       Russell F. Morrison       VI-18         Nov 2, 1981       Marie B. Wickberg       VI-18         Nov 14, 1981       June & Ralph Piccinini       VI-20         Nov 17, 1981       Mrs. Carl L. Cassidy       VI-20         Nov 17, 1981       Beverly J. Skinner       VI-21         Undated       Laura L. Palmer       VI-21         Undated       Ron Peterson       VI-22         Dec 6, 1981       Mary D. Lipski       VI-22         Dec 6, 1981       Gary A. Morrison       VI-22         Undated       Mervin 0. Eriksson       VI-27         Undated       Corolyn G., Sam W., Bill Dennis       VI-28         Jan 14, 1982       Missoula City-County Health Dept       Phillip C. Tourangeau       VI-28         Jan 15, 1982       James E. & Grace Maehl       VI-29       VI-32         Jan 15, 1982       James E. & Grace Maehl       VI-32         Jan 27, 1982       Clayton K. Herron       VI-32         Jan 27, 1982       S  |   |                  |
| Oct 26, 1981       Mary Faye Conn       VI-16         Oct 29, 1981       Allen A. Morrison       VI-17         Oct 29, 1981       Allen A. Morrison       VI-17         Oct 30, 1981       Russell F. Morrison       VI-17         Oct 30, 1981       Marie B. Wickberg       VI-18         Nov 2, 1981       Marie B. Wickberg       VI-18         Nov 14, 1981       June & Ralph Piccinini       VI-20         Nov 17, 1981       Mrs. Carl L. Cassidy       VI-20         Nov 17, 1981       Beverly J. Skinner       VI-20         Undated       Laura L. Palmer       VI-21         Undated       Lorene K. McCoy       VI-22         Dec 6, 1981       Mary D. Lipski       VI-22         Dec 6, 1981       Gary A. Morrison       VI-24         Dec 8, 1981       Gary A. Morrison       VI-27         Undated       Mervin 0. Eriksson       VI-27         Undated       Mervin 0. Sam W., Bill Dennis       VI-28         Jan 14, 1982       Missoula City-County Health Dept       Phillip C. Tourangeau       VI-28         Jan 15, 1982       James E. & Grace Maehl       VI-29       Jan 18, 1982       Evelena Anderson       VI-31         Jan 22, 1982       Albert Borgmann       VI-31  | Oct 15, 1981 Elmer and Eleanor Lachenmaier VI-  | 15               |
| Oct 29, 1981Marie MorrisonVI-17Oct 29, 1981Allen A. MorrisonVI-17Oct 30, 1981Russell F. MorrisonVI-18Nov 2, 1981Marie B. WickbergVI-18Nov 14, 1981June & Ralph PiccininiVI-19Nov 17, 1981Mrs. Carl L. CassidyVI-20Nov 17, 1981Beverly J. SkinnerVI-20UndatedLaura L. PalmerVI-21UndatedRon PetersonVI-22Dec 6, 1981Gary A. MorrisonVI-22Dec 6, 1981Gary A. MorrisonVI-22Dec 6, 1981Gary A. MorrisonVI-24Dec 8, 1981Cass Chinske, Friends of the RattlesnakeVI-27UndatedCorolyn G., Sam W., Bill DennisVI-28Jan 14, 1982James E. & Grace MaehlVI-29Jan 15, 1982James E. & Grace MaehlVI-29Jan 22, 1982Albert BorgmannVI-30Jan 27, 1982Clayton K. HerronVI-34Feb 1, 1982Honorable Pat WilliamsVI-34   |   |                  |
| Oct 29, 1981       Allen A. Morrison       VI-17         Oct 30, 1981       Russell F. Morrison       VI-18         Nov 2, 1981       Marie B. Wickberg       VI-18         Nov 14, 1981       June & Ralph Piccinini       VI-19         Nov 17, 1981       Mrs. Carl L. Cassidy       VI-20         Nov 17, 1981       Mrs. Carl L. Cassidy       VI-20         Undated       Laura L. Palmer       VI-21         Undated       Lorene K. McCoy       VI-22         Dec 6, 1981       Mary D. Lipski       VI-22         Dec 6, 1981       Gary A. Morrison       VI-24         Dec 8, 1981       Cass Chinske, Friends of the Rattlesnake       VI-27         Undated       Mervin 0. Eriksson       VI-27         Dec 21, 1981       Honorable Pat Williams       VI-27         Undated       Corolyn G., Sam W., Bill Dennis       VI-28         Jan 14, 1982       James E. & Grace Maehl       VI-29         Jan 15, 1982       James E. & Grace Maehl       VI-30         Jan 22, 1982       Albert Borgmann       VI-31         Jan 25, 1982       Clayton R. Herron       VI-32         Jan 27, 1982       State of Idaho, Transportation Dept       Boise, ID         Boise, ID       VI-34  | Oct 26, 1981 Mary Faye Conn VI-   | ·16              |
| Oct 30, 1981Russell F. MorrisonVI-18Nov 2, 1981Marie B. WickbergVI-18Nov 14, 1981June & Ralph PiccininiVI-19Nov 17, 1981Mrs. Carl L. CassidyVI-20Nov 17, 1981Beverly J. SkinnerVI-20UndatedLaura L. PalmerVI-21UndatedRon PetersonVI-22Dec 6, 1981Mary D. LipskiVI-22Dec 6, 1981Gary A. MorrisonVI-24Dec 8, 1981Cass Chinske, Friends of the RattlesnakeVI-27UndatedMervin O. ErikssonVI-27UndatedCorolyn G., Sam W., Bill DennisVI-28Jan 14, 1982James E. & Grace MaehlVI-29Jan 15, 1982James E. & Grace MaehlVI-30Jan 22, 1982Albert BorgmannVI-31Jan 27, 1982State of Idaho, Transportation DeptVI-34Feb 1, 1982Honorable Pat WilliamsVI-34  |   |                  |
| Nov 2, 1981Marie B. WickbergVI-18Nov 14, 1981June & Ralph PiccininiVI-19Nov 17, 1981Mrs. Carl L. CassidyVI-20Nov 17, 1981Beverly J. SkinnerVI-20UndatedLaura L. PalmerVI-21UndatedRon PetersonVI-21UndatedLorene K. McCoyVI-22Dec 6, 1981Mary D. LipskiVI-23Dec 6, 1981Gary A. MorrisonVI-24Dec 8, 1981Cass Chinske, Friends of the RattlesnakeVI-27UndatedMervin O. ErikssonVI-27Dec 21, 1981Honorable Pat WilliamsVI-28Jan 14, 1982Missoula City-County Health DeptVI-28Jan 15, 1982James E. & Grace MaehlVI-29Jan 15, 1982Clayton R. HerronVI-31Jan 27, 1982Albert BorgmannVI-31Jan 27, 1982State of Idaho, Transportation DeptVI-34Feb 1, 1982Honorable Pat WilliamsVI-34Feb 1, 1982James C. MercerVI-43  |   |                  |
| Nov 14, 1981June & Ralph PiccininiVI-19Nov 17, 1981Mrs. Carl L. CassidyVI-20Nov 17, 1981Beverly J. SkinnerVI-20UndatedLaura L. PalmerVI-21UndatedRon PetersonVI-21UndatedLorene K. McCoyVI-22Dec 6, 1981Mary D. LipskiVI-23Dec 6, 1981Gary A. MorrisonVI-24Dec 8, 1981Cass Chinske, Friends of the RattlesnakeVI-25UndatedMervin 0. ErikssonVI-27Dec 21, 1981Honorable Pat WilliamsVI-27UndatedCorolyn G., Sam W., Bill DennisVI-28Jan 14, 1982Missoula City-County Health DeptVI-30Jan 22, 1982Albert BorgmannVI-31Jan 25, 1982Clayton R. HerronVI-31Jan 27, 1982State of Idaho, Transportation DeptNI-34Feb 1, 1982Honorable Pat WilliamsVI-34Feb 1, 1982James C. MercerVI-43   |   |                  |
| Nov 17, 1981Mrs. Carl L. CassidyVI-20Nov 17, 1981Beverly J. SkinnerVI-20UndatedLaura L. PalmerVI-21UndatedRon PetersonVI-21UndatedLorene K. McCoyVI-22Dec 6, 1981Mary D. LipskiVI-23Dec 6, 1981Gary A. MorrisonVI-24Dec 8, 1981Cass Chinske, Friends of the RattlesnakeVI-25UndatedMervin 0. ErikssonVI-27Dec 21, 1981Honorable Pat WilliamsVI-27UndatedCorolyn G., Sam W., Bill DennisVI-28Jan 14, 1982Missoula City-County Health DeptVI-29Jan 15, 1982James E. & Grace MaehlVI-29Jan 22, 1982Albert BorgmannVI-31Jan 25, 1982Clayton R. HerronVI-32Jan 27, 1982State of Idaho, Transportation Dept<br>Boise, IDVI-34Feb 1, 1982Honorable Pat WilliamsVI-43   |   |                  |
| Nov 17, 1981Beverly J. SkinnerVI-20UndatedLaura L. PalmerVI-21UndatedRon PetersonVI-21UndatedLorene K. McCoyVI-22Dec 6, 1981Mary D. LipskiVI-23Dec 6, 1981Gary A. MorrisonVI-24Dec 8, 1981Cass Chinske, Friends of the RattlesnakeVI-25UndatedMervin 0. ErikssonVI-27Dec 21, 1981Honorable Pat WilliamsVI-27UndatedCorolyn G., Sam W., Bill DennisVI-28Jan 14, 1982Missoula City-County Health DeptVI-29Jan 15, 1982James E. & Grace MaehlVI-29Jan 22, 1982Albert BorgmannVI-30Jan 25, 1982Clayton R. HerronVI-32Jan 27, 1982State of Idaho, Transportation Dept<br>Boise, IDVI-34Feb 1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43  |   |                  |
| Not 1, 1911DefinitionUndatedLaura L. PalmerVI-21UndatedRon PetersonVI-21UndatedLorene K. McCoyVI-22Dec 6, 1981Mary D. LipskiVI-23Dec 6, 1981Gary A. MorrisonVI-24Dec 8, 1981Cass Chinske, Friends of the RattlesnakeVI-27UndatedMervin 0. ErikssonVI-27Dec 21, 1981Honorable Pat WilliamsVI-27UndatedCorolyn G., Sam W., Bill DennisVI-28Jan 14, 1982Missoula City-County Health Dept<br>Phillip C. TourangeauVI-28Jan 15, 1982James E. & Grace MaehlVI-29Jan 18, 1982Evelena AndersonVI-30Jan 22, 1982Albert BorgmannVI-31Jan 25, 1982Clayton K. HerronVI-32Jan 27, 1982State of Idaho, Transportation Dept<br>Boise, IDVI-34Feb 1, 1982James C. MercerVI-43   |   |                  |
| UndatedRon PetersonVI-21UndatedLorene K. McCoyVI-22Dec 6, 1981Mary D. LipskiVI-23Dec 6, 1981Gary A. MorrisonVI-24Dec 8, 1981Cass Chinske, Friends of the RattlesnakeVI-27UndatedMervin O. ErikssonVI-27Dec 21, 1981Honorable Pat WilliamsVI-27UndatedCorolyn G., Sam W., Bill DennisVI-28Jan 14, 1982Missoula City-County Health DeptVI-28Jan 15, 1982James E. & Grace MaehlVI-29Jan 18, 1982Evelena AndersonVI-30Jan 22, 1982Albert BorgmannVI-31Jan 25, 1982Clayton K. HerronVI-32Jan 27, 1982State of Idaho, Transportation DeptVI-34Feb 1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43  | Nov 17, 1901 Deverify of Drinner  |                  |
| UndatedLorene K. McCoyVI-22Dec 6, 1981Mary D. LipskiVI-23Dec 6, 1981Gary A. MorrisonVI-24Dec 8, 1981Cass Chinske, Friends of the RattlesnakeVI-25UndatedMervin O. ErikssonVI-27Dec 21, 1981Honorable Pat WilliamsVI-27UndatedCorolyn G., Sam W., Bill DennisVI-28Jan 14, 1982Missoula City-County Health DeptVI-28Jan 15, 1982James E. & Grace MaehlVI-29Jan 18, 1982Evelena AndersonVI-30Jan 22, 1982Albert BorgmannVI-31Jan 27, 1982State of Idaho, Transportation DeptVI-34Feb 1, 1982James C. MercerVI-43   |   |                  |
| Dec6, 1981Mary D. LipskiVI-23Dec6, 1981Gary A. MorrisonVI-24Dec8, 1981Cass Chinske, Friends of the RattlesnakeVI-25UndatedMervin O. ErikssonVI-27Dec 21, 1981Honorable Pat WilliamsVI-27UndatedCorolyn G., Sam W., Bill DennisVI-28Jan 14, 1982Missoula City-County Health DeptVI-28Jan 15, 1982James E. & Grace MaehlVI-29Jan 18, 1982Evelena AndersonVI-30Jan 22, 1982Albert BorgmannVI-31Jan 25, 1982Clayton R. HerronVI-32Jan 27, 1982State of Idaho, Transportation DeptVI-34Feb1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43   |   |                  |
| Dec6, 1981Gary A. MorrisonVI-24Dec8, 1981Cass Chinske, Friends of the RattlesnakeVI-25UndatedMervin O. ErikssonVI-27Dec21, 1981Honorable Pat WilliamsVI-27UndatedCorolyn G., Sam W., Bill DennisVI-28Jan 14, 1982Missoula City-County Health DeptVI-28Jan 15, 1982James E. & Grace MaehlVI-29Jan 18, 1982Evelena AndersonVI-30Jan 22, 1982Albert BorgmannVI-31Jan 27, 1982State of Idaho, Transportation DeptVI-34Feb1, 1982Honorable Pat WilliamsVI-34Feb1, 1982James C. MercerVI-43   | Undated Lorene K. McCoy VI-   | -22              |
| Dec8, 1981Cass Chinske, Friends of the RattlesnakeVI-25UndatedMervin O. ErikssonVI-27Dec21, 1981Honorable Pat WilliamsVI-27UndatedCorolyn G., Sam W., Bill DennisVI-28Jan 14, 1982Missoula City-County Health DeptVI-28Jan 15, 1982James E. & Grace MaehlVI-29Jan 18, 1982Evelena AndersonVI-30Jan 22, 1982Albert BorgmannVI-31Jan 25, 1982Clayton R. HerronVI-32Jan 27, 1982State of Idaho, Transportation DeptVI-34Feb1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43  |   |                  |
| UndatedMervin O. ErikssonVI-27Dec 21, 1981Honorable Pat WilliamsVI-27UndatedCorolyn G., Sam W., Bill DennisVI-28Jan 14, 1982Missoula City-County Health Dept<br>Phillip C. TourangeauVI-28Jan 15, 1982James E. & Grace MaehlVI-29Jan 18, 1982Evelena AndersonVI-30Jan 22, 1982Albert BorgmannVI-31Jan 25, 1982Clayton R. HerronVI-32Jan 27, 1982State of Idaho, Transportation Dept<br>Boise, IDVI-34Feb 1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43   |   |                  |
| Dec 21, 1981Honorable Pat WilliamsVI-27UndatedCorolyn G., Sam W., Bill DennisVI-28Jan 14, 1982Missoula City-County Health DeptPhillip C. TourangeauJan 15, 1982James E. & Grace MaehlVI-29Jan 18, 1982Evelena AndersonVI-30Jan 22, 1982Albert BorgmannVI-31Jan 25, 1982Clayton K. HerronVI-32Jan 27, 1982State of Idaho, Transportation DeptVI-34Feb 1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43   |   |                  |
| UndatedCorolyn G., Sam W., Bill DennisVI-28Jan 14, 1982Missoula City-County Health Dept<br>Phillip C. TourangeauVI-28Jan 15, 1982James E. & Grace MaehlVI-29Jan 18, 1982Evelena AndersonVI-30Jan 22, 1982Albert BorgmannVI-31Jan 25, 1982Clayton R. HerronVI-32Jan 27, 1982State of Idaho, Transportation Dept<br>Boise, IDVI-34Feb 1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43  |   |                  |
| Jan 14, 1982Missoula City-County Health Dept<br>Phillip C. TourangeauVI-28Jan 15, 1982James E. & Grace MaehlVI-29Jan 18, 1982Evelena AndersonVI-30Jan 22, 1982Albert BorgmannVI-31Jan 25, 1982Clayton R. HerronVI-32Jan 27, 1982State of Idaho, Transportation Dept<br>Boise, IDVI-34Feb 1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43   |   |                  |
| Phillip C. TourangeauVI-28Jan 15, 1982James E. & Grace MaehlVI-29Jan 18, 1982Evelena AndersonVI-30Jan 22, 1982Albert BorgmannVI-31Jan 25, 1982Clayton K. HerronVI-32Jan 27, 1982State of Idaho, Transportation Dept<br>Boise, IDVI-34Feb 1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43   | Challed , , , ,   | -28              |
| Jan 15, 1982       James E. & Grace Maehl       VI-29         Jan 18, 1982       Evelena Anderson       VI-30         Jan 22, 1982       Albert Borgmann       VI-31         Jan 25, 1982       Clayton R. Herron       VI-32         Jan 27, 1982       State of Idaho, Transportation Dept       VI-34         Feb 1, 1982       Honorable Pat Williams       VI-42         Jan 19, 1982       James C. Mercer       VI-43  |   |                  |
| Jan 18, 1982Evelena AndersonVI-30Jan 22, 1982Albert BorgmannVI-31Jan 25, 1982Clayton R. HerronVI-32Jan 27, 1982State of Idaho, Transportation Dept<br>Boise, IDVI-34Feb 1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43  | I I I I I I I I I I I I I I I I I I I   |                  |
| Jan 22, 1982Albert BorgmannVI-31Jan 25, 1982Clayton R. HerronVI-32Jan 27, 1982State of Idaho, Transportation DeptVI-34Boise, IDVI-34Feb 1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43  |   |                  |
| Jan 25, 1982Clayton R. HerronVI-32Jan 27, 1982State of Idaho, Transportation Dept<br>Boise, IDVI-34Feb 1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43   |   |                  |
| Jan 27, 1982State of Idaho, Transportation Dept<br>Boise, IDVI-34Feb 1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43   | ,   |                  |
| Boise, IDVI-34Feb 1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43  |   | -32              |
| Feb 1, 1982Honorable Pat WilliamsVI-42Jan 19, 1982James C. MercerVI-43  |   | ~ /              |
| Jan 19, 1982 James C. Mercer VI-43  |   |                  |
| 5 an 17, 1762   |   |                  |
|   |   |                  |
| Jan 27, 1982 Leonard J. Connors, Jr. VI-44  | Jan 27, 1982 Leonard J. Connors, Jr. VI-  | -44              |

| Feb 4, 1982  | Allen A. Morrison   | VI-44 |
|--------------|---|-------|
| Feb 4, 1982  | Marie Morrison  | VI-45 |
| Jan 29, 1982 | Barbara Ross  | VI-45 |
| Feb 4, 1982  | Martha Lauterbach   | VI-52 |
| Feb 4, 1982  | James C. Mercer   | VI-52 |
| Feb 5, 1982  | Marie B. Wickberg   | VI-53 |
| •            | Bobbie Strand   | VI-54 |
| Undated      |   |       |
| Feb 4, 1982  | Adele Furby, Granite County Alliance                      | VI-54 |
| Undated      | Mr. & Mrs. Joe Gowan                                      | VI-58 |
| Feb 8, 1982  | Laura Ledbetter   | VI-58 |
| Feb 11, 1982 | Earl M. Pruyn, D.V.M.                                     | VI-59 |
| Jan 22, 1982 | Honorable Max Baucus                                      | VI-59 |
| Feb 17, 1982 | Gary A. Morrison/Anne M. Morrison                         | VI-61 |
| Feb 21, 1982 | David L. Lyon   | VI-62 |
| Mar 3, 1982  | Gary A. Morrison  | VI-62 |
| Feb 24, 1982 | Greg L. Munther, American Fisheries Society               | VI-64 |
|              | Ray Prill, Trout Unlimited                                | VI-65 |
| Mar 5, 1982  |   | V1-05 |
| Mar 19, 1982 | State of Idaho, Dept of Lands                             |       |
|              | Sandpoint, ID   | VI-66 |
| Mar 22, 1982 | F. Lee Tavenner, Granite County Alliance                  | VI-68 |
| Mar 24, 1982 | Leonard W. Smith/William C. Ross                          | VI-72 |
| Mar 24, 1982 | U.S. Dept of Transportation                               |       |
|              | Federal Aviation Administration, Seattle, WA              | VI-73 |
| Mar 20, 1982 | Leonore L. Taylor   | VI-73 |
| Mar 25, 1982 | Stanley F. Kreshel  | VI-74 |
| Mar 23, 1982 | State of Idaho, Military Division                         | VI-74 |
| Mar 29, 1982 | F. Lee Tavenner, Granite County Alliance                  | VI-75 |
|              |   | VI-/J |
| Mar 29, 1982 | Washington State Parks and Recreation Commission          |       |
|              | Olympia, WA   | VI-78 |
| Mar 30, 1982 | U.S. Dept of the Interior, Bureau of Land                 |       |
|              | Management, Billings, MT                                  | VI-78 |
| Aar 25, 1982 | F. Lee Tavenner, Granite County Alliance                  | VI-80 |
| Apr 2, 1982  | Honorable Pat Williams                                    | VI-81 |
| Mar 29, 1982 | State of Oregon, Dept of Environmental Quality            | VI-83 |
| Mar 30, 1982 | U.S. Dept of the Interior, Geological Survey<br>Boise, ID | VI-83 |
| Mar 30, 1982 | F. Lee Tavenner, Granite County Alliance                  | VI-84 |
|              |   |       |
| Apr 2, 1982  | Adele Furby, Granite County Alliance                      | VI-87 |
| Apr 2, 1982  | U.S. Dept of the Interior, Bureau of Mines                |       |
|              | Spokane, WA   | VI-90 |
| Mar 29, 1982 | David L. Lyon   | VI-90 |
| Apr 2, 1982  | Laura L. Palmer   | VI-91 |
| Mar 23, 1982 | Lorraine C. Houppert                                      | VI-92 |
| Apr 2, 1982  | U.S. Dept of Transportation                               |       |
| 1 ,          | Federal Highway Administration, Denver, CO                | VI-93 |
| Apr 8, 1982  | Adele Furby, Granite County Alliance                      | VI-93 |
| Undated      | Janel Gowen   | VI-94 |
| Apr 10, 1982 | James E. Maehl/Grace C. Maehl                             |       |
|              |   | VI-94 |
| Apr 14, 1982 | Rhea Cronin   | VI-95 |
| Apr 4, 1982  | Dale Martin   | VI-96 |
| Apr 2, 1982  | Randy Martin  | VI-96 |
| Apr 8, 1982  | Jim & Donna Dowd  | VI-97 |
|              |   |       |

| Apr 16, 1982 | D. F. Zabel   | VI-98            |
|--------------|---|------------------|
| Apr 20, 1982 | David J. Maclay                                     | VI-99            |
| Apr 19, 1982 | Honorable John Melcher                              | VI-99            |
| Apr 19, 1982 | Raymond O. Jensen                                   | VI-100           |
| Apr 19, 1982 | Barry L. Dutton                                     | VI-103           |
| Apr 19, 1982 | Patrick J. Lawler                                   | VI-104           |
| Apr 19, 1982 | Barbara Evans, Chairperson                          |                  |
| Apr 19, 1962 |   | VT = 106         |
|              | Missoula Board of County Commissioners              | VI-106           |
| Apr 19, 1982 | Honorable Pat Williams                              | VI-106           |
| Apr 15, 1982 | Lawrence Singer                                     | VI-107           |
| Apr 15, 1982 | Rita Conn   | VI-108           |
| Apr 8, 1982  | State of Washington, Office of Archaeology and      |                  |
|              | Historic Preservation, Olympia, WA                  | VI-108           |
| Undated      | Kenneth Mesenbrink                                  | VI-109           |
| Apr 20, 1982 | Larry R. Harper and Pamela A. Harper                | VI-110           |
| Apr 21, 1982 | U.S. Dept of Health & Human Services, Region VIII,  | 11 110           |
| Api 21, 1902 |   | VI-111           |
| 1 20 1000    | Denver, CO  |                  |
| Apr 20, 1982 | John C. Moe   | VI-111           |
| Apr 21, 1982 | Richard Rossignol/Richard M. Rossignol              | VI-112           |
| Apr 19, 1982 | U.S. Dept of Agriculture, Soil Conservation Service |                  |
|              | Spokane, WA   | VI-113           |
| Apr 23, 1982 | Art Aylesworth                                      | VI-113           |
| Undated      | Petition (Mineral County)                           | VI-114           |
| Apr 27, 1982 | Samuel E. Burgess                                   | VI-119           |
| Apr 23, 1982 | John C. Moe   | VI-120           |
| Undated      | Ronald G. Petersen                                  | VI-120           |
|              |   |                  |
| Apr 26, 1982 | C. G. "Pat" McCarthy, M.D.                          | VI-121           |
| Apr 20, 1982 | Laura L. Palmer                                     | VI-121           |
| Apr 28, 1982 | Laura L. Palmer                                     | VI-122           |
| Apr 29, 1982 | Samuel C. Silverthorn, Sr.                          | VI-126           |
| Apr 26, 1982 | Wendell Beardsley                                   | VI-127           |
| Apr 30, 1982 | Don Valiton   | VI-128           |
| Apr 28, 1982 | Laura L. Palmer                                     | VI-129           |
| Undated      | Ted Doherr, Jr.                                     | VI-130           |
| Undated      | Herb & Jean Ferguson                                | VI-131           |
| Apr 27, 1982 | Honorable Max Baucus                                | VI-131           |
| Apr 9, 1982  | Raymond O. and Allie Jensen                         | VI-133           |
| • •          | •   | VI-138           |
| Undated      | A. J. Klapwyk                                       |                  |
| Undated      | Suzanne B. Horton                                   | VI-138           |
| Undated      | Sandra McQuillan                                    | VI-139           |
| Apr 26, 1982 | Honorable John Melcher                              | VI-139           |
| May 2, 1982  | Gerald B. Frank                                     | VI-141           |
| May 4, 1982  | Fred Mello  | VI-142           |
| Apr 21, 1982 | John A. Hollenback/Carole R. Hollenback             | VI-142           |
| Undated      | James Minckler                                      | VI-143           |
| Undated      | Annette M. Stroud                                   | VI-144           |
| May 6, 1982  | Donald M. Nettleton, BN Timberlands                 | VI-145           |
| May 9, 1982  | Joseph D. Peters                                    | VI-145<br>VI-147 |
| Undated      |   | VI-147<br>VI-147 |
|              | S. Hager  |                  |
| Undated      | Nancy Bugbee  | VI-148           |
| Undated      | Shirley L. Weaver                                   | VI-149           |
| Undated      | Jesse Bier  | VI-149           |
|              |   |                  |

| Undated              | Harriet H. Humes                                    | VI-150           |
|----------------------|---|------------------|
| May 11, 1982         | U.S. Dept of the Interior                           |                  |
|                      | Bureau of Land Management, Billings, MT             | VI-150           |
| May 7, 1982          | Leonore L. Taylor                                   | VI-152           |
| May 10, 1982         | Míssoula Rural Fire District                        | VI-153           |
| May 11, 1982         | U.S. Dept of the Army, Corps of Engineers           |                  |
|                      | Seattle, WA   | VI-153           |
| May 7, 1982          | U.S. Dept of the Interior, Office of Surface Mining |                  |
| •                    | Denver, CO  | VI-154           |
| May 11, 1982         | Kevin Suzuki  | VI-154           |
| Undated              | Lavern E. & Shirley A. Johnson                      | VI-155           |
| Undated              | Clarence and A. Wendel                              | VI-156           |
| May 13, 1982         | Eugene & Edna Fontenot                              | VI-156           |
| May 10, 1982         | Charles E. Myers                                    | VI-157           |
| Undated              | David L. Sickels                                    | VI-159           |
| Undated              | Rosalie B. Talbot                                   | VI-159           |
| Undated              | Arthur F. Gidel                                     | VI-160           |
| Undated              | Jack W. Dersam                                      | VI-160           |
| May 14, 1982         | John Russell  | VI-161           |
| Undated              | S. Hoell  | VI-161           |
| Undated              | C. L. Marcum & Rita Marcum                          | VI-162           |
|                      | Richard A. Baenen, Counsel to Confederated Salish   | 1 102            |
| May 13, 1982         | and Kootenai Tribes of the Flathead Reservation     | VI-162           |
| N 1/ 1000            |   | VI-162<br>VI-168 |
| May 14, 1982         | Honorable Pat Williams                              |                  |
| Undated              | Jan & Bud Mariska                                   | VI-169           |
| May 17, 1982         | Susan M. Appelt                                     | VI-169           |
| May 17, 1982         | Donna Meitner                                       | VI-170           |
| Undated              | John A. Mitchell                                    | VI-170           |
| May 18, 1982         | F. W. McCormick/Mary E. DePuy                       | VI-171           |
| Undated              | Henry G. Bugbee                                     | VI-171           |
| May 17, 1982         | Wayne G. Peterson                                   | VI-172           |
| May 16, 1982         | Kent & Jeannine Wilby                               | VI-173           |
| Undated              | T. E. Geraghty                                      | VI-174           |
| Undated              | Mrs. J. L. Chaffee                                  | VI-174           |
| Undated              | Shirley Fisher                                      | <b>VI-</b> 175   |
| May 20, 1982         | Robert G. Anderson                                  | VI-175           |
| May 18, 1982         | Dean L. Parker/Elsie M. Parker                      | VI-176           |
| May 15, 1982         | Elaine M. Murphy                                    | VI-177           |
| May 10, 1982         | Cass Chinske, Friends of the Rattlesnake            | VI-178           |
| Undated              | Sharon Stephens                                     | VI-180           |
| Undated              | Erwin & Ethel Byrnes                                | VI-180           |
| May 19, 1982         | B. C. Shaw  | VI-181           |
| May 17, 1982         | State of Washington, Dept of Ecology                |                  |
|                      | Olympia, WA   | VI-181           |
| May 7, 1982          | State of Washington, Energy Facility Site           |                  |
| • •                  | Evaluation Council, Olympia, WA                     | VI-182           |
| May 1 <b>9,</b> 1982 | Clen & Linda Haas                                   | <b>VI-</b> 184   |
| Undated              | Laro Hensley  | VI-184           |
| May 24, 1982         | U.S. Dept of the Interior, Office of the Secretary  |                  |
| , , <u> </u>         | Portland, OR  | VI-185           |
| Undated              | Phillip R. Fandozzi                                 | VI-187           |
| May 19, 1982         | Allin Hodge   | VI-187           |
| 110y 17, 1702        | marin nouge   | *I 107           |

| May 21, 1982 | Dorothy Jette  | VI-188           |
|--------------|--|------------------|
| Undated      | Ray Lanfear  | VI-188           |
| May 20, 1982 | Merlin and Sandy Lemmer                                | VI-189           |
| Undated      | Sigur C. & Norma L. Stavran                            | VI-189           |
| May 20, 1982 | Janet Rice   | VI-190           |
|              |  |                  |
| Undated      | Nancy Borgmann   | VI-193           |
| May 25, 1982 | Robert M. Clegg  | VI-193           |
| Jun 24, 1982 | Mr. & Mrs. William Courser                             | VI-194           |
| May 24, 1982 | Robert J. Kelly  | VI-194           |
| Undated      | Ellen E. Kinonen                                       | VI-195           |
| May 23, 1982 | Andrew Kulla   | VI-195           |
| Undated      | William C. Maehl                                       | VI-197           |
| Undated      | Carmen J. McFarlane/James P. McFarlane                 | VI-198           |
| Undated      | John Milton  | VI-199           |
|              |  |                  |
| May 23, 1982 | Thresa L. Ramberg                                      | VI-199           |
| Undated      | Claire G. Balliet                                      | VI-200           |
| May 25, 1982 | Albert Borgmann  | VI-200           |
| May 25, 1982 | David Haman  | VI-201           |
| Undated      | Tonja King   | VI-202           |
| May 1982     | Jack & Delores Shuck                                   | VI-202           |
| May 24, 1982 | U.S. Dept of Health & Human Services,                  |                  |
|              | Public Health Service, Atlanta, GA                     | VI-203           |
| May 21, 1982 |  | VI 205           |
| May 21, 1902 | Idaho State Clearinghouse, Div of Economic and         |                  |
|              | Community Affairs, Boise, ID                           | VI-204           |
| May 18, 1982 | Idaho Dept of Fish and Game,                           |                  |
|              | Coeur d'Alene, ID                                      | VI-204           |
| Undated      | Diane and David Bilderback                             | VI-205           |
| Undated      | Verna & Ken Brown                                      | VI-205           |
| May 25, 1982 | Lloyd W. Bruce   | VI-206           |
| Undated      | Doug & Peggy Coffman                                   | VI-207           |
| Undated      | Randy K. Dolven  |                  |
|              |  | VI-207           |
| May 26, 1982 | Richard H. & Joyce C. Gavin                            | VI-208           |
| May 25, 1982 | Mary Ann Holmquist                                     | VI-209           |
| May 26, 1982 | Laura L. Palmer  | VI-210           |
| May 25, 1982 | Ronald & Karen Printz                                  | VI-212           |
| Undated      | William E. Sansom                                      | VI-212           |
| May 25, 1982 | J. Kirk Thompson                                       | VI-214           |
| May 28, 1982 | Honorable Pat Williams                                 | VI-215           |
| May 24, 1982 | Thomas P. and Margot C. Doohan                         | VI-217           |
| Undated      | Mike Conn  | VI-218           |
| Undated      |  |                  |
| May 25, 1982 | Leonard J. Connors, Jr.<br>Emma K. & Robert B. Cummins | VI-219           |
|              |  | VI-220           |
| Undated      | Mervin O. Eriksson                                     | VI-221           |
| May 26, 1982 | Al & Maureen Evans                                     | VI-221           |
| May 24, 1982 | Carla Gonder/George M. Gonder                          | VI-223           |
| Undated      | John A. Harris, M.D.                                   | VI-223           |
| Undated      | Dighton Little   | VI-224           |
| May 25, 1982 | David L. Haman   | VI-224           |
| May 26, 1982 | Frances S. Heard                                       | VI 224<br>VI-225 |
| May 26, 1982 | C. Fred Rappe  | VI-225           |
| May 26, 1982 |  |                  |
|              | Jan Rappe, Valleys Preservation Council                | VI-226           |
| May 26, 1982 | Ty Throop  | VI-230           |

|                      | • • • • •  | WT 001 |
|----------------------|--|--------|
| May 25, 1982         | Jeannie Siegler  | VI-231 |
| Undated              | Harriet Spurlock   | VI-231 |
| May 28, 1982         | Steve & Terryl Eckert                                      | VI-232 |
| May 24, 1982         | Jan Rappe, Valleys Preservation Council                    | VI-233 |
| May 27, 1982         | Kurt and Jeanette Ingold                                   | VI-239 |
| May 27, 1982         | George and Neva McRae                                      | VI-239 |
|                      |  | VI-241 |
| May 27, 1982         | Linda A. Maass/Theresa Thompson                            |        |
| May 28, 1982         | Linda A. Maass   | VI-242 |
| May 2 <b>7,</b> 1982 | Ray and Allie Jensen                                       | VI-243 |
| May 28, 1982         | Gregory Kennett  | VI-244 |
| May 28, 1982         | Denny Anderson   | VI-245 |
| May 28, 1982         | Margaret A. Banning/Barbara L. Bauman                      | VI-246 |
| May 27, 1982         | William and Marie J. Bell                                  | VI-246 |
| May 26, 1982         | Barbara F. Conn  | VI-247 |
| Undated              | Lillie Cowley  | VI-248 |
|                      |  | VI-240 |
| May 26, 1982         | Mary Faye Conn   |        |
| May 28, 1982         | Rita Faye Cunningham                                       | VI-250 |
| May 28, 1982         | Adele Furby  | VI-250 |
| May 28, 1982         | Lee Tavenner, Granite County Alliance                      | VI-252 |
| May 2 <b>7,</b> 1982 | Janet Koon   | VI-295 |
| May 2 <b>7,</b> 1982 | James D. Leuze   | VI-296 |
| May 27, 1982         | Marilyn Mangion-Gray                                       | VI-299 |
| Undated              | Michael Pedersen   | VI-299 |
| May 24, 1982         | David L. Haman, Rimrock Property Owners' Assn.             | VI-300 |
| May 26, 1982         | Mrs. Rogers  | VI-302 |
| May 26, 1982         | Herb Skinner   | VI-303 |
|                      |  |        |
| May 26, 1982         | Beverly J. Skinner   | VI-306 |
| Undated              | Richard Steffel  | VI-306 |
| May 2 <b>7,</b> 1982 | State of Montana, Dept of Natural Resources                |        |
|                      | and Conservation, Helena, MT                               | VI-307 |
| May 24, 1982         | Barbara Ross   | VI-308 |
| May 2 <b>7,</b> 1982 | Rita Faye, Frank, Delane,                                  |        |
|                      | and Lauraine Cunningham                                    | VI-315 |
| May 12, 1982         | Mary L. Hall   | VI-316 |
| Jun 1, 1982          | Mike Cooney for Honorable Max Baucus                       | VI-317 |
| May 27, 1982         | Honorable Max Baucus                                       | VI-319 |
| Apr 23, 1982         | Arthur S. Aylesworth                                       | VI-322 |
|                      |  | V1-322 |
| Jun 4, 1982          | U.S. Dept of Agriculture, Forest Service<br>Washington, DC | VI-322 |
| N 05 1000            |  |        |
| May 25, 1982         | John L. Wozniak  | VI-323 |
| Jun 14, 1982         | U.S. Environmental Protection Agency                       |        |
|                      | Denver, CO   | VI-324 |
| Jun 14, 1982         | U.S. Dept of the Interior, Office of the Secretary         |        |
|                      | Portland, OR   | VI-325 |
| Aug 6, 1982          | Mineral County Planning Board, Superior, MT                | VI-326 |
|                      |  |        |

(WP-SJ-16720)

Ficewood 6 16-81 ETJ-21 CFBPA P.O.

P.O. Box 7692 Missoula, MT 59801

George E. Eskridge, Projects Information Officer BPA Transmission Coordination Office 1620 Regent P.O. Box 4327 Missoula, Montana 59806

Dear Mr. Eskridge:

The following represent the comments of the Clark Fork Basin Protective Association in regard to the BPA's scoping process for its draft EIS on the Garrison to Spokane transmission project. By these comments, CFBPA and NPRC do not waive any rights or claims it may have, pending or future, with respect to the proposed project.

We appreciate this opportunity to comment on the scope of the proposed EIS. We trust that our suggestions will be addressed in the draft and in the final EIS. Our suggestions will be grouped in several areas to ease their incorporation by the authors of the EIS. Before getting into the specifics, a few general comments are in order.

The transmission project of the BPA, from Townsend to points west, is highly controversial. This EIS offers the BPA a unique opportunity to dispel some questions surrounding its involvement with the project. This opportunity should not pass unused.

Having closely followed the BPA's actions thus far on the issue, we are skeptical about the agencies ability to present a thorough, objective, and accurate assessment of the project. An EIS that is full of gratuitous, self-serving comments designed to portray the BPA in a favorable light will do nothing to alter Montanans' perception of the BPA as an arrogant federal agency bent on protecting and expanding its turf.

The authors of the EIS should write it carefully and critically. The quality and credibility of earlier BPA work has suffered when it attempted to avoid an honest discussion of the issues, particularly when these would shed an unfavorable light upon the BPA.

Part of the problem with the BPA producing an unbiased analysis is that the BPA is acting, in this instance, as the judge, jury, and prosecuting attorney. BPA is overseeing BPA's work. Due to the self-financing nature of the BPA, careful congressional scrutiny appears to be sorely lacking. Its role as the lead agency in the Colstrip EIS, while it was, at the same time, a proponent of the project, is a clear example of the problem. BPA functions as CFBPA - page 2

an independent federal agency that is responsible to no one but itself.

We emphasize that it is not accurate to proclaim that the Colstrip project and transmission lines were approved the State of Montana. The Board of Natural Resources approved "Project A". Project A is most definately <u>not</u> being built. Over half of the transmission line is on a different route and, perhaps most importantly, an entirely different entity is building the lines. That entity does not pay taxes and claims exemption from the Montana Major Facility Siting Act. If these factors had been known at the time of the Board of Natural Resources decision, the 4-3 vote of approval might well have gone in another direction.

We hope that the BPA will use this EIS as a forum to accurately describe all aspects of this project. In the long run, a comprehensive and accurate statement will only enhance the BPA's credibility in Montana.

Our comments follow.

Sincerely,

Marjorie Harper President, Clark Fork Basin Protective Assn.

cc Susan Walker Sen. Max Baucus Sen. John Melcher Rep. Pat Williams I. Technology, engineering, health and safety.

The BPA should discuss the following aspects pertaining to the technology, engineering, health and safety aspects of the project in its draft and final EIS.

- BPA should discuss and explain its practices for controlling vegetative growth on the right-of-way. Its use of herbicides along the right-of-way and at substations should be noted. The actual chemicals and their method and frequency of application should be cited.
- 2) BPA should discuss the areas of geologic hazards, with respect to their frequency and severity.
- 3) BPA should discuss the areas of weather hazards, forest and range fires, and floods with respect to their frequency and severity.
- 4) BPA should discuss who is responsible for right-of-way maintenance and fire control. It should discuss how local governments will be reimbursed for these services.
- 5) Line loss of electrical energy from the transmission lines should be discussed. Line loss at low, average, and peak loads should be noted in percentages and actual megawatt figures. Line loss should be compared to total load factors for Missoula and surrounding rural co-ops.
- 6) Field strengths at the edge of the right-of-way should be given for low, average, and peak loads. Field strengths for both AC lines, an AC and DC line, and a DC line should be given.
- 7) BPA should explain what it will do with the towers when the project's life is completed. Will costs include removal of the towers 35 years from now?
- 8) What are the <u>actual impacts</u>? The lines may meet BPA's own standards, but how loud will it be 65' from center line? Can I build a shed 65' from centerline? Must it be grounded? What are the electric field strengths at the edge of the right-of-way? etc.
- 9) How much will the lines droop in normal weather? in hot, humid weather? What are the restrictions on recreation near the right-of-way?
- 10) Discussion of the possible health effects on humans and animals should be included. Evidence from Dr. Marino's studies and the standards that the New York State PSC has set should be thoroughly documented and discussed.
- 11) Will the line eventually be converted to a DC circuit?

II. Process, good government.

In the draft and final EIS, the BPA should address the following issues of process and good government. A clear understanding of its methodology is key for citizens to involve themselves in this process.

- 1) BPA should explain and discuss why it is building the lines from Townsend west.
- 2) Exactly how the input from the scoping meeting is weighed and decided to be included, or not included, in the EIS should be explained. The weight of various factors in the EIS should be explained.
- 3) BPA should explain how the following are <u>substantively</u> involved in this process to meet NEPA requirements and sections 503 and 505 of the Federal Land Policy and Management Act. a. the state of Montana b. the Salish-Kootenai Indian tribe
- 4) An explanation for segmenting the EIS process is needed. First there was a Hot Springs to Bell EIS, then a Hot Springs to Townsend, then a Deer Lodge Valley study, and now a Garrison to Missoula EIS. Why is this process being shifted around so much? Why was the original EIS changed?
- 5) An explanation of how this EIS ties into the Libby integration project is needed.
- 6) BPA hould explain how it will do long range impacts analysis for future lines and pipelines. Has the BPA or the EIS team made any observations, apart from the official BPA position, as to the future use of the corridor as a utility corridor? Has the BPA entered into or discussed any contracts with Northern Tier for power supply or shared use of the BPA right-of-way?
- 7) BPA should explain how it interprets the impact adi payments in the Northwest Power Bill. Are these payments possible every year or only during construction? What is the size of the payments? Will they continue on an annual basis for the life of the project? Can the BPA obtain Congressional authorization to make payments in lieu of taxes to local and state governments?
- 8) BPA should explain its current activities in regard to the possible purchase of the output of Colstrip Units 324 under the guaranteed purchase provision of the Northwest Power Planning Act.
- 9) BPA should explain its current and projected <u>pre</u>construction activities. Has steel been ordered for the line segment west of Garrison? Will the siting of the Garrison substation prejudge a routing of the line from that point west? If not, why not? Does the ordering of construction materials prejudice the actual center line location? If not, why not?

II. Process, good government (cont.)

- 10) If one of the justifications for BPA building the line instead MPC is that BPA could get across the reservation, and a reservation route is not used, why will BPA still build the lines?
- 11) The cumulative and connected impacts of the lines should be discussed in all instances.
- 12) A list of all litigation pending, with an unbiased discussion of the issues involved and how they might alter the project, should be included in the EIS.
- 13) Benefit/cost ratios, in real economic terms, should be layed out in all appropriate places. How much will the project cost BPA, and what is the return on the use of the line by utilities?
- III. Energy Policy

Under this heading, we have grouped several issues which need addressing in the draft and final EIS. It is vital for the authors of the EIS to cite their sources for any comments. The authors should also take care to note any conflicting views, studies, or findings.

- 1) BPA should establish the need for <u>this</u> electrical power. There should be a listing and analysis of:
  - a. power exchange contracts and sales by the BPA and the members of the Colstrip consortium.
  - b. where and for what general category of use the power will be used.
- 2) In a discussion of need, the BPA should compare and discuss the findings of the NRDC study, which was contracted for work by the BPA, in which it was found that with an aggressive conservation program there would be no need for this power. Included in this discussion should be an analysis of long term costs of pursuing alternate strategies.
- 3) BPA should examine and discuss both the short term and the long term benefits of meeting loads with different resource utilization strategies- i.e., mine mouth vs. load center generation.
- 4) To say there is a lot of load growth in rural cooperatives is misleading. If a co-op's load is 10 average megawatts and it experiences a 10% load growth, that equals 1 megawatt. There should be an analysis of the avoided costs of meeting that load growth in co-ops with different strategies- i.e., other sources, renewables, conservation, etc. The <u>actual</u> loads should be listed for all co-ops and utilities in the area.
- 5) BPA should explain and discuss the following:
  - a. its role as lead agency for the Colstrip EIS
  - b. its support of Colstrip Units 324
  - c. the timeframes for completion of the EIS and construction of the project
  - d. its involvement, to date, with members of the consortium

- III. Energy Policy (cont.)
  - 5.) (cont.) that is building units 3&4 on this transmission line.
  - 6) BPA should explain and discuss the impact of the Regional Power Bill on this project.
  - 7) BPA should discuss the results of the 9th Circuit Federal Court of Appeals ruling on the applicability of the Washington State Siting Act to this project. (Columbia Land Basin Protection Association v. Schlessinger).
  - 8) With regard to "Resource 89", BPA should discuss any possibilities that:
    - a. it will construct the transmission lines
    - b. it will purchase the output of this power plant
    - c. any discussion with Montan Power on the above.
  - BPA should provide actual figures, and its methodology for determining those figures, for any statement on:
    - a. electrical power use in Montana
    - b. electrical power flows in Montana
    - c. percentages of Colstrip power to be used in Montana
    - d. energy use and production in Montana
  - 10) BPA should discuss its statements on electrical use in Montana and compare and contrast its statements with these figures from the Montana Department of Natural Resources.

Total generating capacity in Montana = 3,109,2 Megawatts (MW) with 2,204.59 MW being hydroelectric and 1,063.3 NW being thermal

In a median water year, there are 1,173 average MW for hydro In a critical water year, ther are 881 average MW for hydro. Average thermal output is 775 MW

For 1977 there were 1,146 average MW of electricity sold in Montana

With load growth factored in, estimated 1980 sales were 1,366 average MW.

This compares to electrical generation of 1,656 MW in a critical water year.

Thus Montana produced 290 MW more than it used. In addition these figures do not Sreflect the shutdown of the Anaconda facilities, which used an average of 40.7 MW per year.

11) Some discussion of the national security implications of running hundreds of miles of above ground, high voltage lines i through areas is needed. Specific attention should be given to the benefits/costs of different strategies- i.e., mine mouth vs. load center generation, smaller, more dispersed systems vs. larger, centrally located systems, etc.

-4-

IV. Landowner considerations

- 1) When will BPA notify all landowners who live in potential corridors that they live in potential corridors. What will the form of notification that will be used?
- BPA should analyze the effect of the lines on land values- urban, suburban, currently subdivided, potentially subdividable, and agricultural.
- 3) The possibility of undergrounding should be carefully examined and the factors weighed in any decision should be explained.
- 4) Access roads for construction and maintenance should be discussed. Their location and policy for use should be explained.
- 5) BPA's land appraisal practices should be discussed.

6) BPA's land payment policies should be discussed. Is BPA forbidden from making annual payments or is it current practice not to make them?

- 7) Will BPA follow Montana laws on eminent domain or federal laws? Will BPA allow for installment payments?
- V. General Questions
- BPA should explain where the construction force for the line will come from. Will locals be hired or will the force be imported? BPA should list all of its transmission line contractors. BPA should explain if it hires union or non-union labor for its transmission line projects.
- 2) Affiliation for all consultants engaged in the preparation of the EIS should be noted-.i.e., BPA quoting BPA employees on health and safety effects is less than truly believable.
- 3) Why does BPA refer to the project as a 500Kv project when it is twin 500Kv project?

Marine Ferse

-5-

ETJ-21

Sonneville Power adain 1620 ligent P.O. Dox 4327 Missonla, MT. 59806

## Dear Sins:

write to express my opposition to your road 500-KV transmission The discoula area. Srang Creek area near a your proposed Aranī Creek y reduce scenic The Inst reason. living O there have stand the resident area underground transmission remium Telephone lines in order to orecerve esthetic values. proposal your water effort and espeare. make that G-

I also have serious receivations about potential dance health effects. High voltage potential should not be located near residential areas while they have been proven safe.

Place consider an alternation : disnantle one alternation the dear Coast and more it to Colettip. A large amount of pour will be released for wheet Coast consumers, and there would be no need for taxanism lines.

> de lel Zeardely 600 Colorado Dulch Miesnels, Mi 59801

## Received 6.19.81 ETJ. 21

June 16, 1981

George Erskine Projects Information Officer zrA Transmission Coordination &ffice 1620 Regent Missoula, At

#### Dear .r. Erskine;

I have discovered that one of the proposed routes would bring the new power line over Strawberry Ridge which would essentially bring it over my house. This concerns me for several reasons. One of the main reasons that we cought that house is that it is just so darn beautiful up there and it would seem to be a real shame to see that beauty destroyed. That area (Siesta Acres) has covenants to prevent me or my new neighbors from using the land in ways that would destroy its beauty or serenity and it just doesn't seem to make sense that the federal government would route the power line through that area. I am also concerned that the line would make aerial suppression of a forest fire in that area more difficult and thus pose an increased risk to my family and property. Should I ever need to sell my new home, having the power line so close to it would definitely reduce its value. The things that I have read about the possible health risks of living close to a high tension power line leave me feeling that there just might be a health risk for my family were the power line located in that

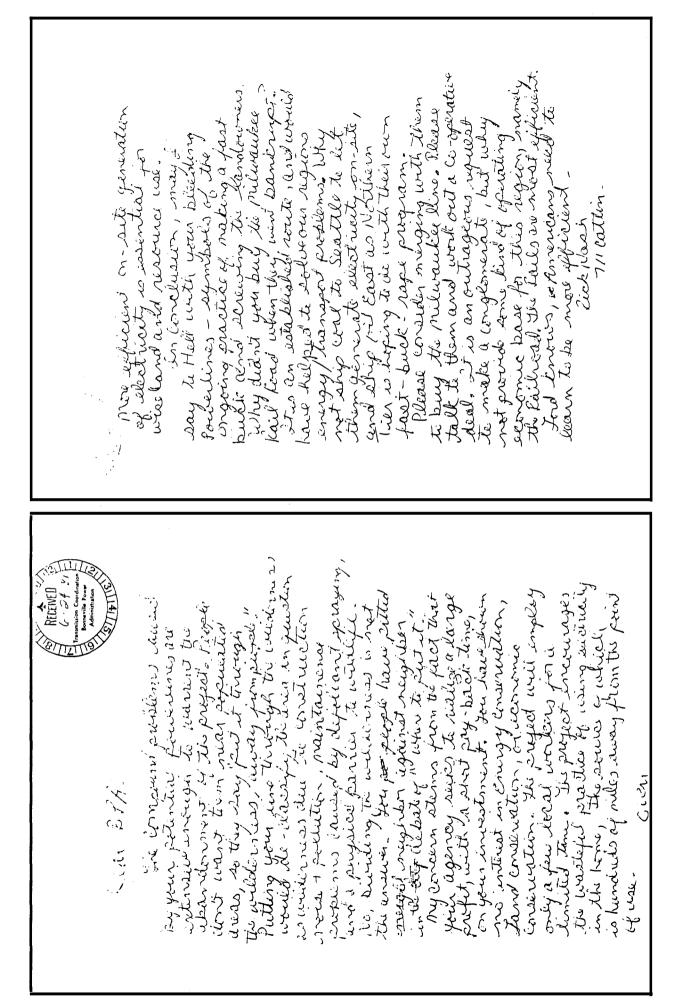
area. I suppose that it would be ironic: I moved out of the Missoula to get away from the health risks of the pollution situation and might find myself face to face with a new potential health risk. Is there no place that is aafe? Finally, I know that the Spring Culch area gets a lot of recreational use since it is so convenient to Missoula and again, it would seem that routing the line through that area would destroy much of the recreational value of this area. I would think that the further into the wilderness the route is moved, the fewer people it would affect, although I am aware that placing the line in the wilderness does present some legal difficulties.

I can well imagine that there is no good place to locate the power line; no place that is so obviously useless that no one would object to its selection. However, it seems to make sense to me either to route the line where it would affect very few people or to use existing routes. To me this latter choice means making what is already ugly uglier rather than destroying something new. It would also strike me that using an existing corrider must be a lot cheaper for the consumers than purchasing a new route.

Thank you for your consideration of my opinion.

Sincerely John E. Stenger

1608 Altura Drive







George Eskridge B.P.A. 1620 Regent Missoùl, Montana 59801

Dear Mr. Eskridge;

Your company's proposal for massive power lines in the immediate vacinity of Rodeo Ranchettes appears unconscionable. I know I speak for my immediate neighbors as well as myself when I proclaim the extreme beauty of the area as one of my main reasons for living here. The wide open vistas and bountiful wildlife, including the bald eagles in Cahoot Canyon and the herds of deer and elk, not to mention the ranch's livestock which mingle on the open range among the indiginous animals, provide a natural serenity in an otherwise anxiety-ridden society.

In addition to the beauty, the area endows a healthful environment which is relatively free from pollution and traffic, provides freedom for children to wander in the hills and along the river, and encourages an active lifestyle associated with the maintenance of rural acreage or the recreational realization of all the above attributes.

I selected this area, moreover, to breed and raise purebred Egyptian Arabian horses whose well-being I place secondary only to my family's. To live here entails considerable financial sacrafice to purchase such valuable property as well as the ongoing expense of commuting to Missoula daily. The intrinsic rewards are well worth the price.

I believe the power line will infringe upon my emotional, physical, and financial security by eroding the extreme beauty of the area, by presenting potential harm to the people and animals in Rodeo Ranchettes and by vastly devaluating one of the most desirable residential havens in Missoula County. For these overwhelming reasons I urge you to develop an alternative course for resolving the future power needs for Western Montana.

Respectfully yours. Donna Wilson

Daughters of the Nile Arabians Donna Wilson 19250 Drails End Road Missoula, Montana 39801 406 273-6093 MONTANA HEART - LUNG SURGICAL ASSOCIATES H.D. ADAMS, M.D., FACS Practice limited to cerdiac, pulmenary, and vacuals' surgery. P.O. Box 4587 Missoula: Montana 56806 June 23, 1981 Telephone: (4061 721-3520 FREPresentative Pat Williams 1512 Longworth House Office Building Washington, D.C. 20515

Dear Congressman Williams:

I am writing in regard to what I consider to be a very serious problem for the city of Missoula. As you are no doubt aware, the Bonneville Power Authority is looking for a corridor through which to carry electrical current from Colstrip to the West Coast. It seems as though Missoula, Montana appears to be one area BPA has chosen to place these corridors. An effort is being made by concerned citizens to acquaint everybody with the size and significance of these transmission lines. Recently, a series of balloons were released above the Missoula Courthouse at approximately 175 feet to make people aware of how large the towere are.

There have been a series of public meetings sponsored by Bonneville Power to allow public input concerning the impact that power lines and towers will have on Missoula. I have been very impressed with the sincere efforts Bonneville Power has made in keeping the public informed, and to listening to people's comments.

However, it is my opinion that with the mandate Bonneville Power has, it is only a matter of time before a route is reached that will have the "least amount of impact" on the citizenry. It is my sincere concern that power corridors and towers of this magnitude do not belong near a city the size of Missoula. I cannot help but envision a tremendous negative economic impact on our community. The scope of the project is awesome. The great size of the towers and the electrical energy flowing in the transmission lines cannot help but be detrimental to any community.

The economic impact will be felt in lost property values, people moving away from the area because of potential health hazards, and the loss of new business reluctant to establish in an area blighted by such power corridors.

I believe the only way to avoid corridors of this nature is to appeal directly to our Congress people. You have done a great deal for the Missoula area, sponsoring the Rattlesnake Wilderness Bill, and recently protecting the Bob Marshall Wilderness. It is common conversation among many people I know that you are the individual to directly ask for assistance. Missoula is currently in the economic doldrums. Our woods products industry is not doing well, there is

- continued -

Page 2 Representative Pat William's RE: BPA

persistent threat of much of the government work being moved elsewhere, and except for a great effort by a number of people, the University of Montana as an economic asset in Missoula might have been lost.

It is felt that large transmission lines will do great harm. It is believed that every effort should be made to place these corridors on public land and avoid populated areas. To many of us, Missoula remains a very important place in which to live. There is still a great deal of positive thinking among a large segment of this population concerning the growth and development of our town, and Bonneville Power's plans to use Missoula can only be detrimental.

I thank you for your time. It is sincerely hoped you will be able to help us maintain a good place to live and work.

PAP:ck

cc: Mr. George Eskridge Mrs. Marjorie Harper Allie L. Jensen 9155 Miller Creek Road Missoula MT 59803

July 10, 1981

Bonneville Power Administration BPA Building, U.S. Dept. of Energy 1002 N.E. Holladay Street, P.O. Box 3621 Fortland, Oregon 97232

Re: Garrison-Spokane Double 500 kV Transmission Project.

Sirs:

The purpose of this letter is to make clear my opposition to siting of a double 500 kV powerline (connecting Colstrip with the Northwest power grid) through or near the Miller Creek area or anywhere in proximity to any populated area.

I also want to clarify the fact that most residents of Miller Creek Valley oppose the Miller Creek route. 97% of respondents to a poll conducted by Miller Creek Valley Landowners Association on May 8, 1981, indicated their opposition to this route.

It is interesting to note that each resident of the Miller Creek area who visits the local BPA office in Missoula is told that there has been little or no negative response from Miller Creek. This is patently false. Is it possible we are not being heard?

On Monday June 15 George Eskridge graciously gave over  $l\frac{1}{2}$  hours of his time to myself and an equally interested resident of Miller Creek Valley, only to subject us to enough half-truths, non-truths, facetious logic, fallacious logic and e vasive tactics to insult the intelligence of an 8-year-old child.

For example, Mr. Eskridge seemed most reluctant to discuss the existing Jocko corridor, the originally agreed upon route for carrying power from Colstrip. I am more curious than ever to know why the existing corridor through the Jocko is not being considered.

We were assured that the New York Public Safety Commission approved 765 kV lines after extensive hearings on public safety; also that BPA's (mere) 20 years of experience with 500 kV lines shows nothing to be alarmed about. However, NYFSC concluded,

"--- the record--- contains unrefuted references of

possible risks that we cannot possibly ignore." (SNYPSC, 1978:39) It should be pointed out that at that time, as is the case at present, the necessary research on biologic effects simply had not been done. We note also that the State of CAlifornia had similar hearings, concerns, and conclusions in 1977. Obviously, better minds than ours have suspicions needing to be put at rest.

Rather than continue listing my failures to elicit bonafide information, or listing further the reasons for my concern, such as information implicating EHV powerlines in leukemia, I will simply try to summarize:

- Please consider a route that bypasses populated areas. Morally there is no more important criteria. Why not place at least as high a premium on human beings as on wildlife? (In spite of Mr. Eskridge's facetious comment that Bambi out in the forest doesn't use the electricity; people do. Therefore let people put up with powerlines.)
- 2. Please bury EHV power lines that are unavoidably close to populated areas.
- 3. Please let it register that the residents of Miller Creek area are nearly unanimously adamantly opposed to having EHV powerlines located anywhere within miles of their homes and families.
- 4. I am also opposed to aerial spraying of ANY herbicides near populated areas. The Miller Creek area is notoriously windy, and wind drift would carry chemicals over our homes.
- 5. Mr. Eskridge inferred that Dr. Phillips, a local vociferous opponent of an EHV route through populated areas, had decided to no longer defend his premise. That is not the case.

Thank you for your attention.

Sincerely

Allie L. Jensen

cc: Congressman Pat Williams Senator Max Baucus George Eskridge Senator John Melcher 10927'Oral Zumwalt Way Missoula, Montana 59803



August 9, 1981

George Eskigge Bonneville Power Administration 1620 Regent Street Missoula, Montana 59806

Dear Mr. Eskigge:

I would like to express my dismay over the proposed placement of the large power lines through Miller Creek canyon.

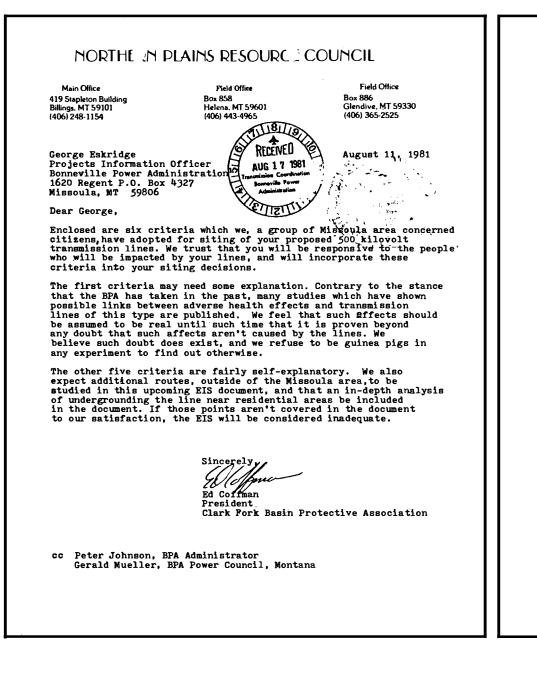
The risks to health, the impact on the environment and animal life in the area, and the general aesthetics of the area are fare more important and irreplaceable than money. The value of the property in the area will certainly drop considerably and permanently.

I would like to urge you to spend the extra money required to place these power lines underground in a safe manner. This includes restoring the environment to its pre-placement state and ascertaining the safety of the underground lines. The visual damage alone is too much to allow. Stop destroying our environment for our sake and the sake of future generations.

Thank you,

finite zuizu Jonette R. Zulauf

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### CLARK FORK BASIN PROTECTIVE ASSOCIATION

President, Ed Coffman 4504 Fox Farm Roaa Hissoula, Ht. 59802 (406) 549-0943 Secretary, Carolyn Hathaway 1502 Aspen Road Missoula, Mt. 59802 (1:06) 728-8052

Re: Siting of double-circuit BPA 500 kV lines

CRITERIA adopted by the CFBPA, August 1, 1981

1. Since there is substantial contradictory scientific evidence concerning human health hazards associated with high voltage powerlines. BPA's siting of these lines should reflect the present uncertainty and both immediate and longterm physiological (including genetic) health effects.

2. Lines sited near residences should be buried to minimize possible damage to people's health.

3. To avoid the devaluation of property and adverse economic effects on individuals and the community, the lines should be kept off private property, out of valley bottoms and away from populated areas. Methods should be used to minimize visibility impacts from the lines and towers.

4. In addition to avoiding residential areas, siting should avoid parks, recreation areas, and other special areas important to the welfare of Missoula and Montana residents.

5. Siting of the proposed lines must take into consideration existing plans and forecasts for future utility corridors.

6. The lines should be sited under Montana's Major Facility Siting Act.

DOUGLAS R. AUSTIN ATTORNEY AT LAW P. O. BOX 297 SUPERIOR. MONTANA 59872 TELEPHONE 406 - 822-4771

August 18,1981

Bonneville Power Administration Transmission Coordination Office P.O. Box 4327 Missoula, Montana 59806

Re: Hot Springs- Bell 500 kv Transmission Project; Tarkio Quadrangle, Montana

Attn: George E. Eskridge

Dear Mr. Eskridge:

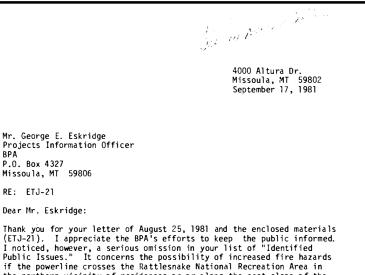
I am a member of and represent the Fold of the Messiah, a christian community located near Tarkio, Montana. This community consists of about a dozen households. It is located in Section 13, T. 15 N., R. 25 W. and Section 18, T. 15 N., R. 24 W., Mineral County, approximately two miles downstream ( Nemote Creek) from one of your proposed transmission corridors for this project.

At your open house in Superior, you indicated that if this route is chosen and if it adversely affects any activity of our community, that BPA will bear any expense incurred as a result.

We have a television system which utilizes a tower located on a mountainside above our community. A cable runs from the antenna on the mountain down to the community. This antenna is located north of the community, in approximately the N.E. 1/4 of Section 13,T. 15 N., R. 25 W. It appears from your proposed map that your transmission line will be approximately the same elevation as our antenna, and that it would intersect or almost intersect the signal which comes to our antenna from Missoula.

It would seem that your proposed transmission line would interfere with our T.V. system, and if this route is chosen, you would have to bear the cost of replacing our system with one that would be at least as effective as the one we now have. Please advise if my understanding is not correct.

Douglas & Austin Douglas R. Austin



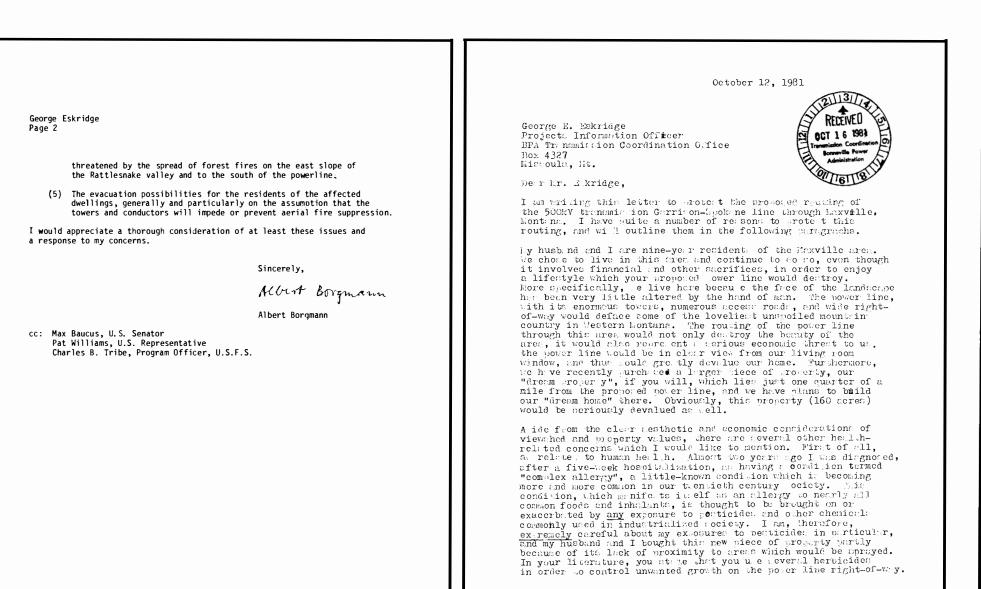
the northern vicinity of residences on or along the east slope of the Rattlesnake valley. I mentioned this problem as point #6 in my letter to you, dated May 31, 1981. This problem may be unique to one route and to one short section of that route. But it is potentially grave. It may lead to the loss of property at a value of around two million dollars, if not the loss of human life. I urge you to give the issue close consideration. This fire season, when at times there were around 200 forest fires burning simultaneously in Montana, has again taught us the precarious situation we pass through nearly every summer.

At a minimum the following problems need attention:

RPA P.O. Box 4327

RE: ETJ-21

- (1) The consequences of the presence of towers and conductors on the effectiveness of aerial fire suppression in the vicinity of those towers and conductors; the consequences both for navigation and communication.
- (2) The likely changes of use patterns due to the availability of access and maintenance roads and the effect of those changes on the possibility of an increasing number of man-caused fires.
- (3) A determination of the probable direction and speed in the spread of forest fires, both man-caused and lightning-caused, along the east slope of the Rattlesnake valley and in the vicinity of the projected towers and conductors.
- (4) A fair estimate of the number and value of the residences



-2-

Use of any of these herbicides <u>anywhere within a radius of</u> <u>several miles</u> would be <u>extremely</u> threatening to my health. Also, let's face it-not enough is really known about the possible effects of living near such a large concentration of electricity to make it very adviseable for a person with such complicated health problems as mine to take the risk to live a user quarter of a mile from such a line.

Related to the problem of human health is that of the health of livestock. I am in the purebred Arabian horse busines., at the moment having a small herd of four, with two due next spring, and with plans for further expansion. I have several extremely valuable mares, whose offspring are going to be worth many thousands of dollars from the time they are born. I <u>cannot afford</u> to take the chance of possible damage to these progeny due to the very close proximity to a power source of that nature. Let's face it--I would have to relocate.

Another reason that we have chosen the above-mentioned property for our home and ranch is due to the nature of my husband's line of work. Although he assists me with my purebred operation, his primary line of work is in the radio-television medium, having worked for a TV station in Missoula for several years, and having done a good deal of free lance work. Our new property has greatly improved television and radio reception over our current home, and is consequently much more desireable for him. The power line threatens to destroy that.

One reason that I was so shocked to hear about the proposed power line routing through Maxville is that it appears that the BPA alre dy has a perfectly useable right-of-way down Necr Hall. According to BA literature, page 3 of "BRA Answers Your Questions On The "Hot-Springs/Bell Transmis. ion Project", "Right-of-way for the new line will parallel old rights-of-w/y whereever possible to reduce environmental impact." Apparently, in this case your own policies are not being followed. I would assume that this is because the BPA will not get so much opposition from private landowners if the line cuts through the public land in the Flint Mountains. Instead, we will all lose some of the most beautiful and accessable mountain country we have left. I protest this possible action, as I believe that it is better to concentrate utility lines in areas which already contain them, rather that cut into our truly scenic mountain land which ought to be a heritage which we can base on to future generations.

I strongly urge that you reconsider your plans to route the power line through this area. Please stick to your original plan to route the line along your pre-existing right-of-way. Thank you very much for your attention.

Sincerely,

adde Fruly

Addle Furby Star Route Hall, Mt. 59837

-3-



4000 Altura Dr. Missoula, MT 59802 October 19, 1981

Mr. George E. Eskridge BPA P.O. Box 4327 Missoula, MT 59806

### Dear Mr. Eskridge:

Thank you for your letter of October 9, 1981. I appreciate the BPA's effort to be forthcoming with its information; at the same time I must point out that your statements have serious and troubling implications. Briefly, the facts that you list as given and which, I take it, the BPA does not dispute raise grave questions regarding an increase of fire hazards for certain homes in the Rattlesnake if the proposed powerline is located in the Rattlesnake NRA. The gravity of these questions requires a full investigation of these hazards <u>before</u> it is decided whether the line should be located so close to these residences. The BPA, however, wants to undertake a full investigation only <u>after</u>, i.e., when and if, it has been decided that the line should be located near the homes.

- Let me be more specific. You take the following facts as established.
  (1) Fire potential is "fairly high" in the Rattlesnake, "especially in the lower areas" which are the ones in the proximity of the endangered homes.
  - (2) "If a fire escapes initial suppression efforts, the probability of significant aircraft use is high."
  - (3) Towers and powerlines of the size here in question pose a hazard to planes that "cannot be totally eliminated," and the immediately surrounding areas "might become off-limits to retardant aircraft."

Let me add to this a few facts which, I am sure, are not disputable either.

- (4) The route which the BPA has selected through the NRA is, according to the line drawn on the map in your office, all of three hundred (300) yards north of the cluster of homes in questions.
- (5) In the summers of 1972 and 1973 there were fires on the ridge between Spring and Sawmill Gulch, which is directly opposite and due west of the residences in question and roughly one half  $(\frac{1}{2})$  mile south of the proposed route. These fires spread so quickly that retardant aircraft had to be called in.
- (6) The:Ratty Canyon fire2bf 1977 took place on a slope and affected homes not unlike the ones under discussion here. There was a delay in the dispatch of retardant aircraft which led to a rapid spreading of the fire and the destruction of residences. The fire was eventually checked with the help of retardant aircraft.

From these undisputed facts alone it follows, I believe, that the presently proposed location of the powerline through the NRA would vastly increase the fire hazards for a great number of homes. But perhaps that does not follow.

October 19, 1981 To George Eskridge From Albert Borgmann Page 2

Perhaps more needs to be known about tower location, access and maintenance routes, user patterns, fuel accumulation, prevailing winds, steepness of slopes, number of houses affected, evacuation routes, etc. before a principled decision can be made. But you propose to postpone these investigations if and until <u>after</u> that route has been chosen when the results of those investigations will be pointless.

To be sure, you say that the BPA will "mitigate or lessen potential impact." I have great difficulty understanding that. How will you mitigate or lessen a fire that may well race up or down the east slope, and engulf and destroy homes? How will you mitigate or lessen the predicament of people who may well find themselves trapped, their only evacuation route being blocked by fire? Or do you mean prevention when you speak of mitigating or lessening? But how could that be done? Do you propose to log and strip of vegetation the east slope of the lower Rattlesnake? Do you propose to construct new evacuation roads which would have to lead through the NRA? Your implication that potential impacts can be mitigated is itself an assumption which needs to be established through the very investigations you refuse to undertake in a timely fashion.

Apart from being unreasonable and potentially harmful, your proposed course of action also fails, I believe, to serve the best interests of the BPA. Assume you select the NRA route and then find it produces, as I believe it will, an unacceptable increase in the fire hazards for dozens homes; the BPA will then have to reopen the route selection process as it already had to once before. Assume on the other hand that having selected the NRA route, you come up with findings which appear to minimize the possibility of increased hazards. How will you ever be able to convince the public, the concerned homeowners, or the courts that your findings were the result of a thorough and unbiased investigation and not simply designed to justify ex post facto a decision which, as you will have to admit, was made largely in ignorance?

If for whatever reasons the BPA decides not to select the NRA route, all will be well. If, on the other hand, the BPA is leaning toward the NRA location, then I must insist that a thorough investigation of all aspects of the increase in fire hazards be undertaken <u>before a final decision</u> is made. I will have to press this point by all appropriate and necessary means.

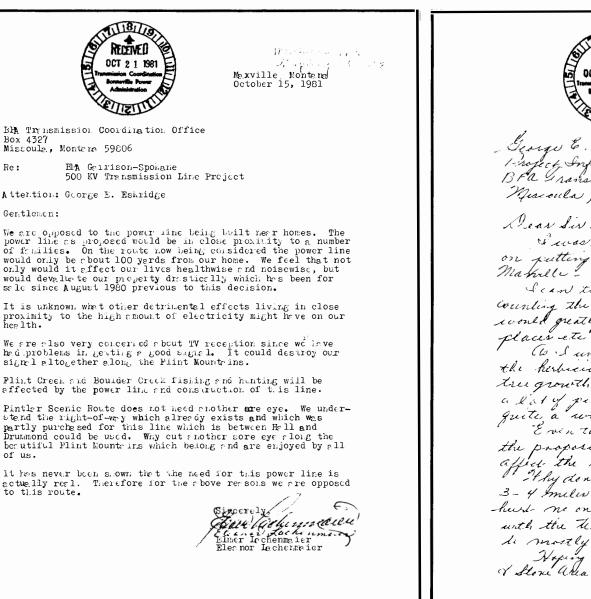
Thank you again for your efforts. I am looking forward to your reply.

Sincerely,

Albert Borgman

Albert Borgmann

xc: Senator Max Baucus Congressman Pat Williams Charles B. Tribe, Program Officer, U.S.F.S.



AN YELLY Maiville Star Pter Philipsong "nit. Oct 27, 1481 George & Estrudge 1-rapect Information Officer BFA Gransmission Coordination Office Muscoula , mit. Cear Sir: on putting the 3-4 power line hear Mapulle - and I think it wa shame. Scan that of 8 people of hand - not counting the village of materille too, that it would greatly affect the sale addety of Their places sete place putting up with the noise & laste of a (W.S understand the noise is harrible, the herbicide you spray to keep weekent tree growth, down, could be detremental to a l'at of people as im cure it will drift quite a ways. Even though I live I miles away from the proposed site, Dri. sure it would affect the saleability of my place, as, It by don't you more the sate around 3 - 4 miles South of mapulles and probably hurd no one - I'm not too as quainted with the terraine there, but it canal to to mostly timber. Hoping you will give us of the Mapille The file In Gratte

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There can be pucklence and the are alles algo clane (Brinz her a canon an ile affant an macherage above) las have the the lines. " O demonant of the have the " O demonant of Acares I're the an Whiting the hast Round Luney Maring Parga Baun Kernel Bauch Emerannesilal Super Narament" cloures dimente of electricity that Ang. 1951. The survey like concentrate to the greations - - + + The pargoily walne going hower, theard departe from area with I done channels to the people on the hight of cong linking allered agreed and and up purity punchased, you arough put if there on mill of the here one of heads the people and there are a great allered and affects it high amount of eace limity there and any are in the and along He ded when the representation Alle project was here in the assumer was office to the grange through and property and an this area the dails want presiden herance of here 26. Anterester objection to the right of cray in the area would be the guellon The hight of money and allonger algost. Joan representation said at a none of the a high good area for grand George E. E. abudge, Regarde Supremetion Officer B. P. a. Transmarcon Conducation Office L'ancaricada an it any more than are the ather people Cret. 26, 1781 Hall INI 3. P. a. Lulleon - Grand Marine Land Terrer ii The Jutur. Deer dir, recong

Maxville Star Route Philipsburg MT 59858

George E. Eskridge Project Information Officer BPA Transmission Coordination office Box 4327 Missoula, Montana 59806

Dear Sirs:

I am writing to protest your routing going near Maxville for your transmission line project.

I live 2 miles north of Maxville and have property very near where I understand you are thinking of going with this line. In fact we just bought 200 acres recently at a very high price near where this would go. I feel that this would devaluate the price of my property there and also the rest of my land which I already. have.

It will certainly take away from the beauty of the surrounding area plus I imagine you will be spraying to keep the greenery down. This will also be hazardous to many of us who have algregies.

One of the big reasons also is that you already have an existing right-of-way, therefore this makes absolutely no sense to me in spoiling another area. I am sure the expense of going this route will be many, many times more costly, therefore the users of the power are the ones that will have to pay more.

I hope you will take this under consideration.

Sincerely yours,

Philipsburg, Montana

October 29, 1981

With this kind of a line I have been told that you do not know what the total effects will be on people, cattle and other living creatures. This alone is real reason for my protest.

Maxville Star Route Philipsburg MT 59858

George E. Eskrige Project Information Officer BPA Transmission Coortination Office Box 4327 Missoula, Montana 59806



Philipsburg, Montana

October 29, 1981

Dear Sirs:

It is my understanding that your are considering installing your transmission line project near Maxville.

I would like to go on record as strongly opposing this route for many reasons. Some of them are as follows:

You already have an existing right-Of-way near Drummond. I can see no reason to even consider spoiling the beauty of another area when you already have one.

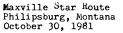
I understand that you will probably be spraying to keep the folage down, this too will affect many people in the area.

The cost will undoubtably be much more to make a whole new route than using the existing one. Someone will have to pay for this, and I<sup>o</sup>m sure it will end up being the ones that receive the service.

We own land very near this and it will without a doubt devaluate the property. We recently bought 200 more acres very close to this area. We had to pay a very sizeable price for the land and are not looking forward to something like this coming in and making our property drop in value right off.

I hope you will consider the above comments.

Sincerely yours,



George E. Eskridge Project Information Officer BPA Transmission Coordination Office Box 4327 Missoula, Montana 59806

Dear Sirs:

I live approximately 2 miles North of Maxville and am very concerned about the proposed route of your transmission line project.

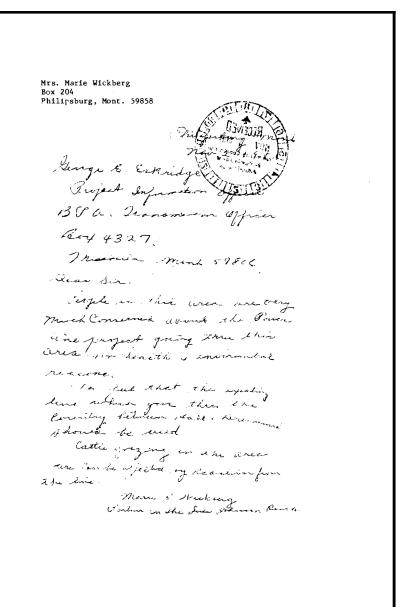
I can see no reasonable reason to go this route when you already have an existing route. The additional expense of this totally new route alone is going to be unreasonable. It would be a real shame to ruin the beauty of this area with this project.

I have an interest in a ranch in this area and feel that this will certainly devaluate the price of the property.

I hope you will take this under consideration.

Sincerely yours,

Russell F. Manison



Retyped from original letter

Nov. 14, 1981

Dear Sirs

We most certainly want to be counted against putting the BPA transmission lines through the Miller Creek Area. We feel that the lines should most certainly be put in an area where there are not people residing such as way back in the Rattlesnake area. Also they surely could be buried, and no one would ever have to see them. We are very much concerned over what health hazzards (sic) might show up in years to come. We also must think of the devaluation of our propertys (sic).

Thank you

/s/ June & Ralph Piccinini 10375 Oral Zumwalt Rodeo Ranch #6 Missoula, Mont. 59803



November 17, 1981 Maxville Star Route Philipsburg, Mont. 59858

BPA Garrison-Spokane 500 KV Transmission Line Project

George F. Eskridge,

Dear Sir:

I'm writing to protest the building of the transmission line in the Maxville area for these reasons:

First, I have a health problem , I'm highly sensitive to any pollution sprays, preservitives, noise, etc. If it is true that the right of way will be sprayed with a herbicide, it would be very dangerous to my health and to my family. Also we grow a garden each year, what effect would this have on it?

Second, it would deface the countryside. We have lived here twenty-one years, if we were forced to sell becauce of my health, our property value would be very low because of this unsightly power line. We are living here for the reason that we what to live in an uncongested area. We have sacrificed much to live here where it is quiet and private. There are few jobs in this area so to five here one has to live on less.

Third, what effect would this line have on animals, horses, cattle, chickens, pets, etc? What about TV reception?

According to BPA literature, "right of way for the new line will parallel old right of ways whenever possible to reduce encironmental impact". Why not use the old right of way? Or if I might make a suggestion -There are eight or nine miles between Maxville and the nearest ranch towards Philipsburg, why not build it between these two places and be on the safe side and satisfy the people?

Thanks !

Sincerely Mrs. Carl R. Earing



#### Mr. George &. Eskridge:

I called your office recently to learn if the proposed BPA powerline was routed through our land and learned that it was crossing the SW corner of section 6 Township9/W west of Hall. Although Herb and Elsie Skinner are the owners, we are on a joint venture agreement with them and are renting this section and therefore feel grave concern over this proposal.

Some of ourspecific concerns include:

1. What health affects will this high voltage line have on our cow/calf pairs that use this area for summer pasture? Will calves be able to maintain their daily gains or will weaning weights be down? Will cows get\_ bred back as usual? Just what are the affects on fertility? Will abortions increase?

2. This section is a year round habitat for many deer and elk. How will they be affected?

3. Although no one lives there now, there is a homesite on this section that several members of our families have considered reusing as a summer home. What affects will it have on any people living there?

4. How will it affect plant and vegetation growth? We are dependent on this section for both cattle grazing and timber harvesting?

5. To our understanding herbicides will be sprayed in the area under the powerline. What affects do they have?

6. Access roads to this route needed for construction and maintenance will bring more vehicles back into this area; resulting in more open gates, more scattered cattle. Less gain on calves.

7. What will a powerline thourgh the area do to property values?

8. What noise level will a line this size create?

9. What will a powerline through the area do to the solitude and beauty of this land?

My understanding is that if you have an existing right-of-way for powerlines, (though the Drummond valley) that you must consider this route first. Yet you wold me on the phone that this route is pretty well out of the picture. What is wrong with this route? It would certainly be the cheapest way instead of having to build one somewhere else. If it is the agriculture in this area that you're concerned about, why weren't you concerned when the first powerline was built? Why aren't you concerned now with the agriculture along this southern route? If you routed a few more miles south at Maxville and then a little more west thereafter, it seems to me you could keep the line mostly on government ground and then you wouldn't have near the worry about the agricultural aspects or private landowners.

I am opposed to this propoased route as it is today and feel there are many questions that remain unanswered.

I have also never received the forest service map you promised me a month ago with the alternate proposed routes on it.

Thank you.

Luciup q. Skinner

Mrs. Beverly J. Skinner Drawer A Hall, Montana 5 837 406-288-3872



Garrison-Spokane 500 KV Transmission Project United States Department of Energy

Bonneville Power Administration,

The B.P.A. should put the 500,000 volt power lines along with the already existing lines.

It will destroy the environment, the areas wilderness and wildlife habitat.

The people of Mineral County do not want the line running through our County, and know one wants the unsightly lines through their private property. We as tax payers and American Citizens feel we have the Constitutional

right to speak and to stop the lines from going across our private property, If we choose to do so. Our Fore fathers didn'f fight for our freedom to have it taken away from us.

B.P.A. representive George Eskridge at a public meeting in St. Regis, told us the B.P.A. really wasn't interested in the people of Mineral Countys opinion, economic or environmental future nor that the property owners didn't want the lines running through their property, the only impact the B.P.A. is tuned into is the political impact. I have know desire to help supply power to other states, nor the B.P.A.'S Nuclear plants in Washington.

Mr. Eskridge more or less told the property owners, keep quiet, pay your taxes, and the B.P.A. will do what they want with our private property. Know matter how much it destroys the property and its value, It's our loss, not theirs. The profit is theirs for after all, the B.P.A. gets their lines at the cost of the property owners, by condeming the private property, and stealing what the B.P.A. wants, and destroying the land and environment, for their own benefit, while the private property owners, and tax payers pay for the lines that we do not want. We will pay through higher rates on our electric bills, while the other

states bills will go down. The power lines will not benefit the people of Mineral County in anyway, only destroy its beauty.

The B.P.A. or Power Companies, already have existing lines, the land and environment, wildlife have already been destroyed, so why scatter the mess, and destroy more with the unsightly lines, when they can keep the lines where they already exist. "The alternative routes are needless.

Laura L. Palmer P.O. Box 18 St. Regis, Montana 59866

Sincerely Jauro & Pelme Tax Payer Property Owner Concerned Citizen Registered Voter

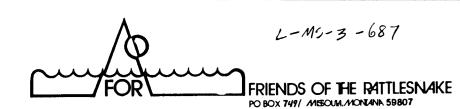
Dean Sir, I am writing in of the B. P.a. running a power se Momeral County. the is already right of way to the perth of we den't need our County to be we den't need our Contry to be Tom up more Thigh it already has been. There is absive Ty no berefit over our County by R. P.a. build, g here. B. p.t. should stay over in LUM. and or. When They Belong. leave Month to The people of Month. C. P. Determan

DeBorgia MT 59830

Januar - Spehane my openions on the B. P.A. united states Dept. of Energy me tax which and no venier standing we will why we have to put up putting a earry power eure. B.P. A. with this upper systeme when, st. Regio, Montana. if any your, which will be about the meal at seat, Wear Sur. et moneal site to express et moused when to Annow are forced by a government understanding that our coast of this line that we cloub want. I also power with Juil in id is chod we the the paying understand that it will guvernent? affect our school jurnaling, oducation. yast this planer dire is a thread to our childhens ire oppression and own for our independence? To et caris understand why

land inunacement in terms of land use and potential county. Frankly, I think its a bad choice. Why dent you use the land you've already built on up by Hot Springs for your choice? That would seem to be hunce effectient. when the perfort corridor 13- already in existence? Mcry D. Lipch. Star Route Pax 434 ST Regis MT. 59866 and must strees the equally important as pinsibility 12-6-81 Statement of wy concerned interest in this It am writing this letter to the Kinnis throw I land munurers have today tours twise Land use. Why should you eleans to develope on new land I rulize the need for such development Heak Consider my point. This letter is a mutter. Be logidal and efficient in your Chroice and build up by Hot Springs. feel about your proposed powerline rute through mineral A THE CASE OF THE Simerely DILL SIL , exploitation. BAA a concerned atyon 8 Jax payer of Mennel County of the menual lounts Sun is suggest you do. To the expressed alot of weeks a color and are surved by alot all you haven't read 29865 St. Reyus, mt the Discontien 3rd reacie Bex 124 melen

r a greet the Ę t operation under Pluse place my name on your mailing list and and me on goal information on the subject is not atto Lonard nocias lee l stay a viry active role in 620 I the Mapille and a king conside Leaung again when you arte erodent your assumptions you al in I will be very intrusted in i K K elal. Fork calles concider. If then that your agreed . not the migeonerplan that . sopulated sonthern ed APPR deres National Forest lan proceed no not not public input plan to mound suprie. HI ER Y resource mutification activity that would be dependent the according a soo L' I om ademantly opposed to a lange KU power line is one of the most degrading activities that can possibly occur on the er k the the bus, and shen to reture any interest in any in activity that would I was born and research in the Maquell Juncan, AK 99801 to oppose and such south theory wind a I have received information suggesting that your aging muy to considering a rest for the 500 KV Annion - Sochane power line the would wave the third cuck chilling in the Maxwelle and Gary A. Morrison 9329 Turn Street RECEVED Dec. 6, 1981 power his the Maphielle and are, own property there, and George Eskridge Project Info. Officer 812 Tran. Coord. Office Missoula, MT 5-9806 Bax 4327 S. land



December 8, 1981

George Eskridge Bonneville Power Administration 2324 McDonald Missoula, Montana 59801

## Dear Mr. Eskridge,

The recently elected board of the Friends of the Rattlesnake unanimously reaffirms the position that FOR is opposed to any BPA powerline route through the Rattlesnake Valley.

FOR opposes the route alternative that would pass through the Rattlesnake National Recreation Area for these reasons:

1) This route would entail the prominent placement of 175 foot steel towers on the ridges that border Rattlesnake Creek and Spring Creek. This development would severly impact the natural values in the very area of the NRA that is most heavily used for recreation. In addition to the obvious visual impact, this route would bring nuisance shocks, noise pollution and scarring of the hills with access and maintenance roads. The outstanding beauty as well as the accessability of this portion of the Rattlesnake NRA has prompted consideration of a special trail here for handicapped and special needs people. The current planning the Forest Service is undertaking to enhance and secure the recreational values of the NRA would be pointless if this powerline route is adopted.

2) This route would violate both the intent of Congress and the mandate of the BPA. In the Rattlesnake National Recreation Area and Wilderness Act of 1980, Congress finds that the lands of the NRA "have high value for municipal watershed, recreation, wildlife habitat, and ecological and educational purposes." The Act declares it to be the policy of Congress "to promote the watershed, recreational, wildlife and educational values" of the NRA lands.

It is the BPA's mandate, as stated in the Pacific Northwest Electric

Power Planning and Conservation Act, "to protect, mitigate and enhance the fish and wildlife" of the Columbia River and its tributaries.

These congressional findings and policies, as well as the BPA mandate, are not compatible with the construction of a high voltage power line through the Rattlesnake National Recreation Arca.

This area is used by elk and deer for winter range. The necessary construction and maintenance roads for the powerline as well as the powerline itself would degrade the area's wildlife habitat qualities.
 Road and staging area construction would cause erosion and siltation for a significant length of time and lead to a deterioration of the municipal watershed.

5) The 175 foot high towers and conductors would prevent accurate aerial fire suppression in an area where, due to intensive recreational use, the danger of man-caused fire is high.

FOR also unanimously opposes the construction of the BPA line through the presently existing corridor (near Lincoln Hills) for these reasons:

1) The visual impact of 175 foot towers would degrade not only the scenic values of the Rattlesnake Valley, but the entire northern vista as seen from nearly any point in the city of Missoula. FOR has broadened its concern to the protection of the open spaces in the Lincoln Hills saddle, Mount Jumbo area and the North Hills, including Grant and Butler Creeks, westwest of the lower Rattlesnake. There would be little to protect if these areas are marred by a massive powerline.

2) The areas mentioned above are crucial winter range for a number of elk herds. The BPA line may require road construction and increase the vulnerability of the area as wildlife habitat through intrusion and disturbance.

3) The route would cross a heavily populated area which might lead to detrimental long term health effects, a problem that has yet to be settled definitely and satisfactorily.

Sincerely,

The Board of Directors of Friends of the Rattlesnake:

Cons CL 10

Cass Chinske, President Albert Borgmann Philip Crissman Jeffrey Dumas David Guth Bill Kerling Les Pengelly Forrest Poe

cc: Senator Max Baucus Senator John Melcher Representative Pat Williams Governor Ted Schwinden U.S.Forest Service City of Missoula County of Missoula The Missoulian Mervin O. Eriksson 2401 South Hills Drive Missoula, MT 59803

Mr. George Eskridge Projects Information Officer Bonneville Power Administration

Dear Sir:

I strongly oppose any powerline route in the Ninemile Valley. I think the the route which you have proposed along the Clark Fork Valley is vastly preferrable from both environmental and socio-economic standpoints. The Ninemile Valley has substantial residential development particularly along the west side of the valley, whereas the Clark Fork Valley is already basically a transportation corridor.

The Ninemile Valley is still relatively unspoiled and it will probably remain that way since the Northern Tier Pipeline appears to be dying. The Clark Fork Valley already has a number of existing corridors(Interstate, railroad, etc.). A powerline route in that area would have significantly less impact than a route up the delicate Ninemile Valley. The Clark Fork Valley route would be much further from private land and therefore have little or no impact on private property values. I think this has to be a strong consideration and from what I have seen and heard the Montana Congressional Delegation strongly supports this opinion.

Sincepely, Alervin d Enforce Mervin O. Eriksson

PAT WILLIAMS ANTER DISTRET MANY WHAT LAND INGTON DEPICE

VARYNER D.C. 20515

T ELENADOR. (201) 225-3211

TOLL PREZNUMMED 1-403-313-4177



CONGRESS OF THE UNITED STATES HOUSE OF REPRESENTATIVES WASHINGTON, D.C. 20515

EDUCATION AND LABOR ALEMENTARY, BECONDARY AND VOCATIONAL EDUCATION LANCH STANDARD HUMAN REPOURCES INTERIOR NATIONAL PARKS 

December 21, 1981

Mr. Peter T. Johnson Administrator Bonneville Power Administration P.O. Box 3621 Portland, Oregon 97208

Dear Mr. Johnson:

As the Bonneville Power Administration continues the process of determining a proposed route for the Colstrip transmission lines through Western Montana, I again encourage you to please consider carefully the suggestions made by all persons directly affected by the proposed lines.

As you know, the Colstrip transmission project was authorized by the Congress before I was elected to the U.S. House of Representatives and before you became the Administrator of BPA. Notwithstanding that fact; I believe we both have a duty to ensure that these lines are routed in as reasonable and environmentally sound a manner as possible.

I appreciate your continued efforts and assistance in this matter.

Best regards.

Sincerely, 1.1-3.4-120 The Line with

Pat Williams

cc: George E. Eskridge Projects Information Officer BPA Transmission Coordination Office

> THUS ST. TRY PRINTED ON PAPER MADE WITH RECYCLED FIBERS



To Whom It May Concern;

We would like to have you very much consider our objections of having the B.P.A. line so close to our property. Actually, we'd prefer not to have it in Montana at all but realize that due to so called progress they're going to force us to accipt this ugly added scenery!..

Our range for our cattle will be effected by the lines and towers and roads. We'll have to ride under them and around them six months out of the year. Definitely the line will be a detriment to the value of the property and the scenic value of the entire area. The noise, interference, and electric fall out from these lines will be much too close for comfort:

We do not want this B.P.A. line here at all but would be more willing to cooperate if it was moved further South in a area that wouldn't cross so many privately owned pastures and agricultural areas:.

Please give this some serious attention:

Corolyn G. Dennis Sam W. Dennis Bill Dennis

By :

Stor Raute Drummond MT 59832 January 14, 1982 Mr. George E. Eskridge Projects Information Officer Department of Energy BPA Transmission Coordination P. O. Box 4327 Missoula, MT 59806



Dear Mr. Eskridge:

The purpose of this letter is to discuss some concerns that the Missoula City-County Air Pollution Control Board has with the proposed 500 kV transmission lines. Our concerns revolve around two issues concerning air quality: (1) the production of ozone, around power lines, and (2) the production of abnormally high levels of positive ions should the lines be converted to direct current (DC) transmission. Because these factors have the potential for adverse air quality impacts, particularly where the lines will cross private lands and create potential human exposure, we would like to make the following requests.

MISSOULA CITY-COUNTY HEALTH DEPARTMENT 301 West Alder - Missoula, Montana 59802 - Ph. (406) 721-5700

Because ozone violations near high voltage lines have been documented (although not substantiated), we request that a box model be created to indicate potential maximum ozone concentrations, using available emission factors for ozone from power lines, and worst case meteorological data from Missoula. Sufficient meteorological information was collected during the Montana Air Pollution Study to conduct such a model. This information includes wind speed, direction, and mixing heights, and is available from the Montana Air Quality Bureau for the years 1978-1980.

Perhaps of even greater concern to us is the fact that the power lines are being designed for possible conversion to DC transmission. Substantial documentation is available which indicates a substantial potential for adverse health and/or behavioral impact where mammals are exposed to elevated levels of positively ionized air. As a result, we request that BPA show documentation that the proposed right-of-way and minimum height of the line are adequate to substantially ameliorate elevated ion levels, given local meteorology, where the lines cross private lands. This would be of particular importance in areas where a potential exists for medium to high density res dential development (e.g., the Ratlesnake or Miller Creek).

MAKING A DIFFERENCE

.1/14/82

Further, we ask that BPA would officially assure the Board and County Attorney that an entire environmental impact statement be conducted if BPA were to convert the lines to DC transmission.

If you have any questions, please don't hesitate to contact either me or the Department.

Sincerely,

Chairman / Missoula City-Count Board of Health

Maxville Star Koute Fhilipsburg, Mt. 59858 January 15, 1982

Nr. George Eskridge Bonneville Power Administration Transmission Coordination F. O. Box 4327 Missoula, Mt. 59806

Dear Sir;

We have been residents of Kaxville, Montana for over thirty five years and own several pieces of property in the townsite.

Needless to say, when we heard that BFA had chosen their southern route for the twin 500 kv powerline which would cross Flint Creek just south of Maxville, we were very distressed.

As we understand the situation the BPA chose this southern route in preference to their present BFA right-of-way near Drummond because the Drummond route was too close to populated areas and crossed apricult rel land.

We do not understand why the BrA feels this southern route would be more beneficial since it would pass almost directly over the populated area of Maxville and it would cross more than ten miles of privately owned apricultural land.

At the present time the Townsite of Maxville is a prime spot for either retirement homes or recreational homes as it is shtuated between Flint Creek and Boulder Creek, close to mony mourtain lakes and in a very good hunting area. However this will not be the situation if the BFA chooses this southern route and crosses the Maxville area. O If this should haven it would greatly devalue the property because of the ecological damage and other factors which have not been determined yet. a) We do not know yet whether this powerline would ruin TV and radio 'reception. ) We understand that it is guite noisy and we dc not know how it would affect an individual's health. "Also there are several mines on the west side of Flint Creek, one of them is ours, over which the proposed powerline would run. We are wondering what affect this powerline would have on using explosives at the mine. We would greatly appreciate answers to these questions.

We feel that if the BPA would move the powerline further south, possibly midway between Maxville and Philipsburg, most of the above objections would be overcome.

> Sincerely, Jares E. Kachi Sund O Maulu Jares E. Kachi Grace C. Machi



Granite County Alliance Evelena Anderson Star Route Hall, Montana 59837 January 18, 1982

George Eskridge Bonneville Power Administration Transmission Coordination P.O. Box4327 Missoula. Montana 59806

Dear Mr. Eskridge:

I am writing on behalf of the Granite County Alliance, a group of Granite County citizens, recently formed in response to the BPA's plans to route the twin 500 KV line through our area. Nost of us have only recently (within the last month or so) become aware of the possibility that this line would come through here. We wish to make is clear that while we disapprove of the presence of this line anywhere in Granite County, we feel that there is a better route several miles south of Maxville. Our basic reasoning behind this belief is spelled out in the enclosed resolution unanimously adopted by the Granite County Alliance.

We feel that we have a unique situation here in Granite County in that we have an area that this power line could cross which would be nearly 100% on public ground. Therefore, from a political point of view, we believe that the BPA would be well advised to locate the line in this area where the political opposition would be close to nil. It represents a chance for the BPA to point to an area where it was able to respond to citizens' concerns and locate the line in an essentially uncontroversial area.

We are interested in meeting with you and with your engineers and coordinators in the near future so that we can present our ideas in person and discuss the possibilities with you. At that time we hope to have members of our concressional delegation present also. We will be in touch with you to arrange a date when we can get together. In the meantime, we urge you and your engineers to give serious consideration to our proposal.

> Sincerely yours, Suctinal Filleson. Evelena Anderson Secretary

# PETITION

Wë'the undersigned residents of Granite County hereby request the Bonmeville Power Administration to relocate the proposed southern route of the twin 500 KV powerline so as to cross Flint Creek several miles south of Maxville.

Principal Objections to the powerline being located on the present BPA right-of-way near Drummond are that the route is too close to populated areas, that the route crosses too much agricultural land, and the route crosses private rather than public land. The southern route alternative was drafted in response to these objections. however the southern route as currently located by the BPA has all the same problems as the Drummond route.

 It does not avoid populated areas; instead it passes almost directly over the populated area of Maxville.

(2) It does not avoid private agricultural and timber land between Gold Creek and H\_rvy Cabin.

(3) It is not primarily on public land; almost one-half of the line between

 $\label{eq:condition} \textbf{Cold Creek substation and HarvyCabin is private property.}$ 

Relocating the proposed southern route approximately midway between Maxville and philipsburg would almost entirely eliminate objections one two and three listed above;

(1) It would avoid essentially all residences.

(2) It would avoid almost all private agricultural land.

(3) It would be almost entirely on public land.

Although our proposed route would be slightly longer and somewhat more costly to build, we the people who must live with this line for the remainder of our lives strongly believe that this would be a much smaller <u>real</u> price to pay. Our proposed more southern routing would offer a <u>real</u> alternative to the Drummond route. This Resolution was unanimously adopted by the members of the Granite County

Alliance at the January 14th meeting;

They are as follows -

| Nane                             | Address             | Phone                         |
|----------------------------------|---------------------|-------------------------------|
| Adel Furby ( Chairman)           | Maxville            | 859 <b>-3380</b>              |
| Lee Tavenner (Asst. Chairman)    | Maxville            | 859-3380                      |
| Evelena Anderson (Secretary)     | Hall                | 288-3314                      |
| Gordon Foster ( asst. Secretary) | Maxville            | 288-3370                      |
| Dave Hauptman (Treasurer)        | Hall                | 288-3469                      |
| Corolyn Dennis (asst. Treasurer  | Maxville            | 288-3300                      |
| Sam Dennis                       | Maxville            | 288-3300                      |
| Bill Demnis                      | Maxville            | 288-3300                      |
| Barbara Conn                     | Hall                | 288-3327                      |
| Leonard J. Connors Sr.           | Pringeton           | 200-5527                      |
| Leonard J.Connors Jr.            | Princeton           |                               |
| Pat Perry                        | Drummond            | 288-3474                      |
| Arthur Kolbeck                   | Hall                |                               |
| Evan Kolbeck                     | Hall                | 288-3408                      |
| Mike Conn                        | Hall                | 288-3394                      |
| Laura Ledbetter                  | Maxville            | 288-3370                      |
| Rita Conn                        | Hall                | 288-3394                      |
| Mary Rodgers                     | Maxville            | 859-3368                      |
| Charles H. Dringle               | Maxville            | 859-3368                      |
| Frank Waldbillig                 | Philipsburg         | 859-3282                      |
| Carl L. Cassidy                  | Maxville            | 859-3349                      |
| Helen Cassidy                    | Maxville            | 859-3349                      |
| Jerry E. Cassidy                 | Maxville            | 859-3349                      |
| Ray Lucier                       | Maxville            | 288-3442                      |
| Wilford J. Johnson               | Hall                | 288-3315                      |
| Robert Spitzer                   | Mamville            | 859-3881                      |
| WJames E. Maehl                  | Maxville            | 859-3325                      |
| Grace Machl                      | Maxville            | 859 <b>-3</b> 325             |
| Kelly Spitzer                    | Paxville            |                               |
| Dale Martin                      | Maxville            | 85 <b>9-3</b> 881             |
| Randy Martin                     | Naxville            |                               |
| J.C. Mercer                      | Haxville            |                               |
| Janie Sullivan                   | Drummond            | 2 <b>88-3</b> 818             |
| Bill Wight                       | Hall                | 288-3447                      |
| Fred Weaver                      | Clinton             |                               |
| Albert Boomer                    | Hall                | 825-7366                      |
| Evelyn Boomer                    | Hall                | 28 <b>8-3</b> 309             |
| Kieth Graybeal                   | Hall                | 288-3309                      |
| B\$11 Ohrmann                    | Drummond            | 288~3407                      |
| Jhon Ohrmann                     | Drummond            | 288-3319                      |
| Helen Konda                      | Maxville            | 288-3319                      |
| Judy Hogan                       |                     | 859-3384                      |
| Tom Hogan                        | Hall<br>Cold Crack  | 288-3333                      |
| Dan Hauptamn                     | Gold Creek          | 288-3333                      |
|                                  | Hall                | <b>208-</b> 3469              |
| Marilyn Dagel                    | Philipsburg         | 859 <b>-3</b> 984             |
| Marvin Dagel<br>Leland Skaw      | Philipsburg<br>Hall | 859 3984<br>28 <b>8 3</b> 428 |
| Herb skinner                     | Hall                | 288-3374                      |
| Bev Skinner                      | Hall                | 288-3872                      |
|                                  |                     | 200 5072                      |



Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

Thank you for your letter of December 23, 1981. Again I appreciate your effort to answer my concerns, and I must quite disagree with the conclusions your office arrived at.

First I must note that your recent letter is inconsistent with that of October 9, 1981. The serious concerns you expressed in your earlier letter about the obstacle that a powerline constitutes for aerial fire suppression are rejected in your recent letter without any evidence being given that: your earlier and persuasive points were mistaken or unfounded.

As regards your point that powerlines of the size in question have never ignited a fire and are extremely unlikely to do so, I am willing to accept it, and in fact I have never raised it myself.

But on the main issue, my view of the matter remains the same. If the EIS of the BPA were to favor the route through the Rattlesnake NRA and would pay no more attention to the diminishment of fire protection for nearby residences due to the construction of the powerline, the BPA would be acting in willful ignorance of significant prima facie dangers to property and human lyles. In that case I would be forced to take the BPA to court in order to obtain from the BPA an investigation of these prima facie dangers and hazards, an investigation which would be sufficiently professional, detailed, and thorough to settle this issue conclusively one way or the other.

Thank you again for your attention.

Sincerely,

Albert Birghamman Albert Borgmann

cc: Max Baucus, U.S. Senator Pat Williams, U.S. Representative Charles B. Tribe, Program Officer, U.S.F.S.

VI-31

Clayton R. Herron Michael Meloy Richard J. Llewellyn Herron, Meloy & Llewellyn Attorneys at Law SECURITIES BUILDING P. O. BOX 783 HELENA, MONTANA 59624 January 25, 1982

AREA CODE 406 PHONE 442-9430 442-2442



Bonneville Power Administration Right-of-Way Division Department of Interior Bldg. Lloyds Square Portland, OR 97232

#### Gentlemen:

I am co-owner of most of the townsite of the unincorporated village of Maxville, Montana, and of real property immediately adjacent thereto.

Rumor, somewhat supported by indications of your representatives, has it that you have plans to erect a many k v transmission line coursing through or near this property. I believe it is your Mr. Stoker who has called me a couple of times promising to come and discuss this matter with me, but to date he is a definite "no-show."

I am also informed that many of the other owners of property in, and near, Maxville, have been protesting the routing of this line through the Maxville area and that there has been suggested a more southerly route which would avoid interference with, and depreciation of, property of resident, private owners.

I respectfully suggest that you give serious attention to the suggestions of this group. It may be that the more southerly route through this area would incur to an extent, a longer route and consequently higher construction costs. But, I'm wondering whether due consideration has been given to a realistic appraisal of the right-of-way acquisition costs to be incurred by unduly interfering with the lives and property rights of so many citizens if the Maxville route were to be adopted.

In this connection, it is to be noted that the Maxville Townsite is a platted sub-division, the larger portion of which is owned by Mrs. Fred Metcalf of Drummond, Montana, Page 2 Bonneville Power Admin January 25, 1982

and myself. These past several months Mrs. Metcalf and I have been negotiating for sale of this property for homesite development, and the prices discussed, I can assure you, have been substantially higher than those which would relate to rural, agricultural land. Whether just compensation for such, and similar lands, is based upon a "taking" by way of actual ground occupation or by way of depreciation of the entire townsite, I'm confident that the suggested more southerly route would be considerably less expensive as far as right-ofway costs would be concerned.

But, aside from financial considerations, I'm sure that the protests which have materialized have shown you that even where the power of eminent domain is extant, it should be exercised fairly so as not to interfere, unduly, with citizens and the free enjoyment of their property. The impact upon such citizens should not, by unfeeling bureaucratic myopia, be cast aside as a consideration.

If I have been misinformed about your intentions, or the possible consequences thereof, I request that your representative make an early effort to get together with me and re-educate me. In the meantime, put me down as vehemently protesting the routing of your line through or near the Maxville area.

I presume to add that in the years of 1949 to 1952, inclusive, I was on the legal staff of the Bonneville Power Administration and handled many right-of-way matters in the course of such employment. As to several cases, I assisted in the prosecution of eminent domain litigation. Since that time, I have represented the Montana Highway Department handling more than a couple dozen of their cases in right-of-way litigation. Also, I have represented Mountain Bell Telephone Co. in such litigation and have been successful in representing landowners in condemnation proceedings for determination of just compensation.

You probably can assume that adoption of the Maxville route is going to wind up in court, sooner or later, unless we can have better reassurances and attention than we've been able to generate on your part so far. Page 3 Bonneville Power Administration January 25, 1982

I cannot speak for other landowners involved, but my information convinces me that most of them share my feelings.

HERRON

/jo

cc: Mrs. Adele Furby Star Route Hall, MT 59837

> Hon. Max Baucus 1107 Dirksen Senate Ofc. Bldg. Washington, D.C. 20510

Hon. Pat Williams U.S. Congress 1512 Longworth Building Washington, D.C. 20515

Hon. John Melcher U.S. Senate 253 Russell Building Washington, D.C. 25010

Bonneville Power Administration 2324 McDonald Missoula, MT 59801 ETJ~21

February 5, 1982

Mr. Clayton R. Herron Attorney at Law Securities Building P.O. Box 783 Relena, Montana 59624

Dear Mr. Herron:

Thank you for your letter concerning the Garrison-Spokane 500-kV Transmission Project. A copy of your letter has been sent to our environmental staff in Portland.

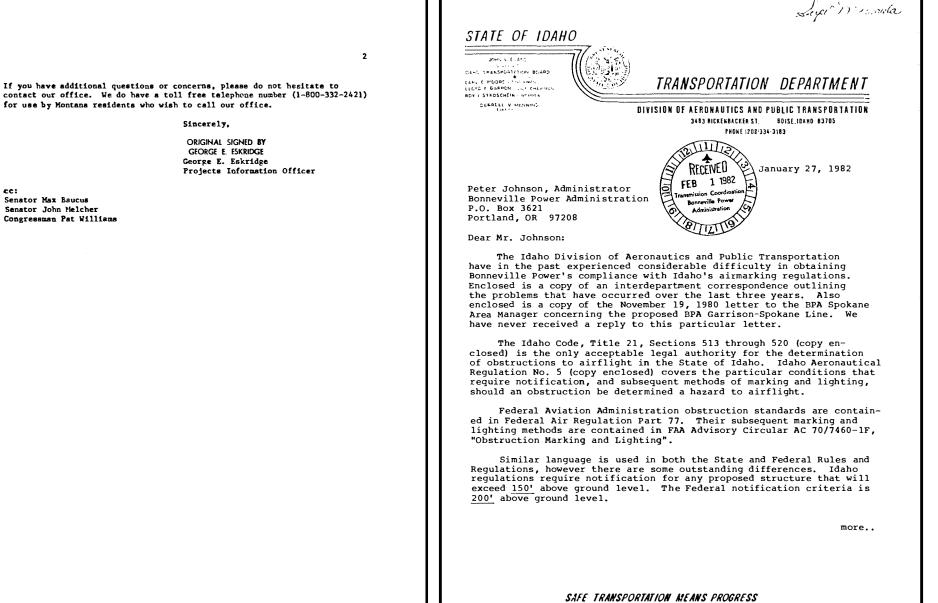
I understand that you have recently met with Al Stocker and Lou Driessen of our agency and discussed the route alternative through the Maxville area. We appreciate the courtesy extended by you during this meeting.

Because of the concerns expressed by the Maxville area residents, we are evaluating other routing alternatives through this area, primarily south of Maxville. This evaluation will require several weeks to complete; however, we will attempt to keep you and the Maxville area residents advised of our progress.

We anticipate publishing a draft environmental impact statement on the project in late March or early April of this year. Following the release of the draft, we will hold a series of public meetings to obtain comments from the public concerning the statement. Written comments may also be aubmitted at this time. This, of course, would be an ideal time to submit formal comments concerning routing alternatives through the Maxville area.

We will prepare a final environmental impact statement based on comments received on the draft. The final statement is anticipated to be published aometime this summer. Following another comment period, a decision will be made as to which route will be used for the transmission line.

We have added your name to our project mailing list in order that you continue receiving updated information concerning the progress of the project.



cc:

FOUAL OPPORTUNITY FMPLOYER

# STATE OF IDAHO - TRANSPORTATION DEPARTMENT

Peter Johnson, Administrator Bonneville Power Administration January 27, 1982 Page Two

Idaho Regulation No. 5 requires that power line crossings, when determined to be a <u>HAZARD</u>, <u>SHALL</u> be marked with <u>54</u>" minimum diameter, <u>multi colored</u> spheres placed at <u>200'</u> intervals. Federal requirements from AC 70/7460-1F dictate the use of a minimum <u>20</u>" diameter <u>orange</u> sphere placed at <u>600'</u> intervals when the crossing is located more than 15,000' from an airport, or <u>150'</u> intervals when located less than 15,000' from an airport.

As noted above, the Idaho notification and marking requirements are more restrictive than the Federal requirements.

The BPA has indicated that to avoid marking regulation conflicts, they must comply with the Federal Regulations. This is not a valid point considering that the Idaho Standards exceed the minimum Federal Requirement. In 1978, Idaho Power Company obtained a marking deviation from the FAA which allows the use of the Idaho Standards in place of the Federal Requirements. This deviation has been applied to all Federal marking directives in Idaho since then. (copy of deviation enclosed).

All lines existing in Idaho have received an obstruction evaluation and those constituting a hazard marked in accordance with Idaho Regulation No. 5. We sincerely believe that should BPA fail to mark their hazardous span, the exposure to disasterous accidents will be extremely high. All Idaho aviators expect hazardous spans to be marked, hence specifically look for the Idaho markings.

Without question the Federal markings are totally inadequate. By the time an aviator can see the 20" spheres and react, it is too late to miss the conductors. We do not feel the question BPA should consider is the "compliance with regulations" rather, it should be safety and exposure to litigation.

There are no provisions in the Idaho Code for exempting government agencies from marking requirements. The two major private power companies that operate in the State have always complied with Idaho marking regulations. In addition, other government agencies, including the BIM, Forest Service, Army Corps, etc., have been extremely cooperative in complying with Idaho's marking regulations.

more...

# STATE OF IDAHO - TRANSPORTATION DEPARTMENT

Peter Johnson, Administrator Bonneville Power Administration January 27, 1982 Page Three

If you are interested in obtaining the FAA's viewpoint on Idaho's Regulations, we suggest you contact:

Ted Melland, Airspace Specialist, ANW-533 FAA Building, Boeing Field Seattle, Washington 98108

Telephone No. 206-767-2610

Presently, we are very concerned with the proposed BPA Garrison-Spokane Line which will cross northern Idaho. Without a doubt, some portions of the proposed line will exceed the height requirements for notification as set forth in Idaho Regulation No. 5. Some portions of the line may require marking after an aeronautical study has been completed.

The State of Idaho intends to enforce the applicable provisions of the Idaho Code and Regulation No. 5 for the Garrison-Spokane Line.

We hope that we may have the BPA's cooperation in this matter.

Sincerely,

WORTHIE M. RAUSCHER Administrator

Somy a. 13mp

LARRY A. HIPPLER Airport Development

LAH/vp cc: BPA, Area Manager - Spokane w/attach Supervisor, BPA Trans. Coord. Office - Missoula w/attach L.H., W.P., J.H. Director - ITD Legal Counsel - ITD

# STATE OF IDAHO

Intra-Department Correspondence

Division of Highways Division of Aeronautics & Public Transportation

IO: ADMINISTRATOR

DATE: June 8, 1981 SUMM N. 1044 BY. LARRY A. HIPPLER

FROM. AIRPORT DEVELOPMENT

TRANSPORTATION DEPARTMENT

SUBJECT: MARKING BPA TRANSMISSION LINES IN IDAHO PROJECT No: Key No:

The following is a list of events concerning our efforts to have a BPA line marked near Bonn - Ferry. Also included is correspondence relating to the proposed Garrison - Spokane 500-kv Line across Northern Idaho. (Formerly Hot Springs - Bell Substation).

#### January 18, 1979

Our previous Safety Information Officer (J. Conder) requested information on an existing BPA crossing of the Kootenai River near Bonners Ferry.

# February 20, 1979

We received a memo from J. A. Storm of the BPA, indicating they would send us a copy of FAA Form 7460-1 and a related strip map. Shortly thereafter, we received an A-7460-1 (filed by BPA on 2-8-79) for the crossing in question (BPA identification UT 66 to UT 67).

## May 7, 1979

FAA, NW Region requested marking of the subject crossing.

# July 7, 1979

The BPA submitted Marking Plans per FAA AC 70/7460-lF to the FAA.

## August 28, 1979

Jim Hetherington flew the subject crossing and recommended marking per State requirements.

more....

ADMINISTRATOR June 8, 1981 Page Two

## August 30, 1979

We sent a request to BPA (J.A. Storm) to mark UT 66 to UT 67 per Idaho Code and Regulation No. 5.

#### September 12, 1979

We received a letter from BPA (C. F. Clark, Chief, Branch of Transmission Engineering) indicating that the BPA would only comply with Federal Marking Requirements contained in FAA AC 70/7460-1F.

## September 20, 1979

Intra-Departmental correspondence from A&PT Administrator to ITD Legal, request assistance in obtaining marking compliance of BPA.

# October 1, 1979

Letter from ITD Legal (Trabert) to BPA Administrator (Munro) requesting marking action per our request of 8-30-81.

# October 25, 1979

We received a letter from BPA (Omar Halvorson, Assistant General Counsel), refusing to comply with the State of Idaho marking regulations. He referenced several court cases as justification for noncompliance.

## November 12, 1980

We received a copy of public meeting results held in the Spring of 1980, relating to a proposed BPA powerline (Hot Springs - Bell Substation) which will run from Eastern Washington, across Northern Idaho, to Western Montana. Their enclosed literature indicated the tower structures would be 175' AGL, exceeding our 150' notification height.

# November 19, 1980

We sent a letter to BPA (R. H. Wilderson, Area Manager, Spokane) expressing our concern for aeronautical safety, and enclosed copies of our marking regulations. We also notified him that the Federal marking standard was not acceptable in Idaho. We have never received a reply to this particular piece of correspondence.

more....

ADMINISTRATOR June 8, 1981 Fage Three

# May 14, 1981

We received an invitation to comment on the Montana Section of the Hot Springs - Bell Line (now renamed "Garrison - Spokane 500-kv Transmission Project").

Enclosed are copies of the above referenced correspondence.

LAH/vp Enclosures

Ronald B. Wilkerson, Area Manager Bonneville Power Administration Room 561, U.S. Courthouse West 920 Riverside Avenue Spokane, Washington 99201 Dear Mr. Wilkerson Thank you for sending us the information for the proposed Hot Springs to Bell Substation transmission line. 1.0 We are enclosing a copy of Idaho Aeronautical Regulation No. 5 "Marking of Obstructions to Airflight," for your information. This regulation requires that you notify us of any proposed structures or powerline spans that exceed 150 feet above the ground Iquel. After notification, we will conduct an airspace evaluation to determine if the proposed structure or span will constitute a hazard to the safe flight of aircraft. If a hazard determination is made, the structure or powerline will have to be marked in Laccordance with Section 5.3 of Regulation No. 5.

November 19, 1980

Please note that the marking requirements specified in FAA Advisory Circular 7460-1 are not acceptable in Idaho.

Since your average proposed tower height is 175 feet, it appears that we will have to evaluate the entire powerline route after it has been selected.

Depending on the route selected, the proposed powerline could have a severe detrimental effect on the safety of air traffic in the State of Idaho. From this standpoint, we are looking forward to close cooperation with your department in the planning and construction of this line.

#### Sincerely

WORTHIE M. RAUSCHER Administrator

LARRY A. HIPPLER Airport Development

LAH: PO

36

Compiler's notes, Far words "this act" see compiler's notes, § 21-501.

**21-509.** Separability. — If any provision of this act or the application thereof to any person or circumstances is held invalid, such invalidity shall not affect the provisions or applications of the act which can be given effect without the invalid provision or application, and to this end the provisions of this act are declared to be severable [1947, ch. 130, § 9, p. 315.]

Compiler's notes. For words "this act" are compiler's notes, § 21-501.

21-510. Short title. — This act shall be known and may be cited as "The Airport Zoning Act." [1947, ch. 130, § 10, p. 315.]

Compiler's notes. For words "this act" see compiler's notes, § 21-501.

21-511. State land adjacent to public airport — Notice of intention to sell or lease. — No land owned by the state of Idaho adjacent to a public airport, or adjacent to land acquired for use in connection with such airport, shall be sold or leased without first giving to the public authorities owning such airport at least twenty (20) days' written notice of the intention to sell or lease such state land. [1941, ch. 6, § 1, p. 14.]

Compiler's notes. It is to be noted that matter, are a separate enactment from the §§ 21-511, 21-512, though related in subject Airport Zoning Act.

21-512. Authority to sell or lease. — The state board of land commissioners is hereby authorized to lease any state lands adjacent to any public airport, or adjacent to lands acquired for use in connection with such airport, for public airport purposes, or for use in connection with such airport, upon such conditions as the board may determine for the best interests of the state, and for such term as said lands shall be used or be deemed desirable for use in connection with such public airport, that any granted lands from the United States government to the state under the provisions of section 5 of the Idaho Admission Bill [26 Stat. at Large, ch. 656, p. 215] may be leased for a term not exceeding five(5) years. [1941, ch. 6, § 2, p. 14.]

Compileo's notes. The bracketed reference Admission Bill appears in Volume 1 of the '26 Stat. at Large, ch. 656, p. 218' was Idaho Code. inserted by the compiler. The Idaho

21-513. Declaration of policy. — As a guide to the interpretation and application of this act, the public policy of this state is declared to be that any hazard to the safety of air flight may cause disastrous and needless loss of life and property, that safety in air flight is of paramount importance for the protection and well-being of the people, that the use of the air space if

17

#### AIRPORT ZONING ACT

constantly increasing and is vital to the continued growth, development and enjoyment of the great natural resources and economy of this state and that the general welfare of the citizens of this state requires, under the police powers of the state, that maximum safety precautions to air commerce be enseted and maintained. [1955, ch. 241, § 1, p. 540.]

Compiler's notes. For words "this act" refer to S.L. 1955, ch. 241, compiled herein as # 21-513 --- 21-520.

**21-514.** Definition of terms. — As used in this act the terms structure, person, department and director shall have the meanings defined in section 21-501, Idaho Code. [1955, ch. 241, § 2, p. 540.]

Compiler's notes. For words "this act" see compiler's notes, § 21-513.

21-515. Marking of obstructions to air flight. — Any structure which obstructs the air space more than one hundred fifty (150) feet above the ground or water level when determined by the director of the Idaho transportation department to be a hazard or potential hazard to the safe flight of aircraft shall be plainly marked, illuminated, painted, lighted or designated in a manner to be approved by the director, so that the same will be clearly visible to airmen. [1955, ch. 241, § 3, p. 540; am. 1974, ch. 12, § 109, p. 61.]

Compiler's notes. Sections 106 and 110 of S.L. 1974, ch. 12, are complied as §§ 21-505A and 21-519.

21-516. Determination of obstructions. — In determining the structures which are or may be hazard to air flight the director shall consider the terrain, character of the neighborhood, uses to which the structure and surrounding property may be adaptable, and the character of the flying operations expected to be conducted in the area. [1955, ch. 241, § 4, p. 540.]

21-517. Procedure for determination of obstructions. — When the director determines that a structure is a <u>probable</u> obstruction within the meaning of this act, he shall notify the owner of the land, or operator or owner of the structure who shall have twenty (20) days after the receipt of such notice to show cause why such structure should not be determined to be an obstruction. [1955, ch. 241, § 5, p. 540.]

Compiler's notes. For words "this act" see compiler's notes. § 21-513.

21-518. Judicial review. --- Any person aggrieved by the decision of the director in making a determination within the meaning of this act may appeal such determination to the district court of the judicial district in

38

which such structure is situated in the same manner in which appeals are taken from the board of county commissioners to the district court. [1955, ch. 241, § 6, p. 540.)

AERONAUTICS

Compiler's notes. For words "this act" see compiler's notes, § 21-513.

21-519. Rules and regulations. - The director of the Idaho transportation department shall adopt and may, as conditions require, amend such rules and regulations as he deems necessary to provide reasonable standards of marking, painting, lighting, illuminating, designating and maintaining any such air flight hazards to the end that the same will be made clearly visible to airmen in order that maximum safety may be provided for air flight. [1955, ch. 241, § 7, p. 540; am. 1974, ch. 12, § 110, p. 61.]

Compiler's notes. Sections 109 and 111 of Section 124 of S.L. 1974, ch. 12, provided S.L. 1974, ch. 12, are complied as \$\$ 21-515 the act should take effect on and after July 1, and 21-803 1974.

21-520. Violation of act, penalties, injunction. - Whenever any person refuses or neglects to illuminate, mark, paint, designate or light, as required by this act, a structure owned or operated by him after the same has been designated by the director to be an obstruction to air flight, he shall be guilty of a misdemeanor, and upon conviction thereof, shall be fined not less than \$100, nor more than \$300, for each offense, or the director may maintain an action in the name of the state of Idaho to compel compliance by mandatory injunction.

That after the first conviction and fine, every subsequent period of 30 days during which such person neglects to comply with the provisions of this section, shall constitute a separate offense and be punishable as provided herein. [1955, ch. 241, § 8, p. 540.]

Compiler's notes. For words "this act" see \_\_\_\_\_it would have passed this act and each section, compiler's notes. \$ 21-513.

section, subsection, sentence, clause, or phrase of this act is for any reason held to be unconstitutional, such decision shall not - unconstitutional." affect the validity of the remaining portions of this act. The legislature herebydeclares that emergency. Approved March 15, 1955.

subsection, sentence, clause and phrase Section 9 of S.L. 1955, ch. 241 read: "If any thereof, irrespective of the fact that any one or more in section, subsection, sentence, clause or be declared phrase Section 10 of S.L. 1955, ch. 241 declared an

#### CHAPTER 6

SITTION

#### STATE LANDS RESERVED FOR PUBLIC AIRPORTS

SECTION 21-601, 21-602. [Repealed.] Twin Falls County - Description of 21-603 lands

21-504. Twin Falls County - Lease of lands.

21-605. Valley County - Description of lands. 21-606. Valley County - Lease of lands

#### 10.5

#### MARKING OF OBSTAUCTIONS TO AIR FLIGHT

\*5.1 The State Board of Aeronautical Directors in order to fulfill the reguirements of 21-513, 21-519, 21-133, Idaho Code, and to protect and insure the general public interest and cafety, the safety of persons operating, using or treveling in, aircraft issue this regulation relating to the marking of obstructions to air flight through the eirspace of and over this state.

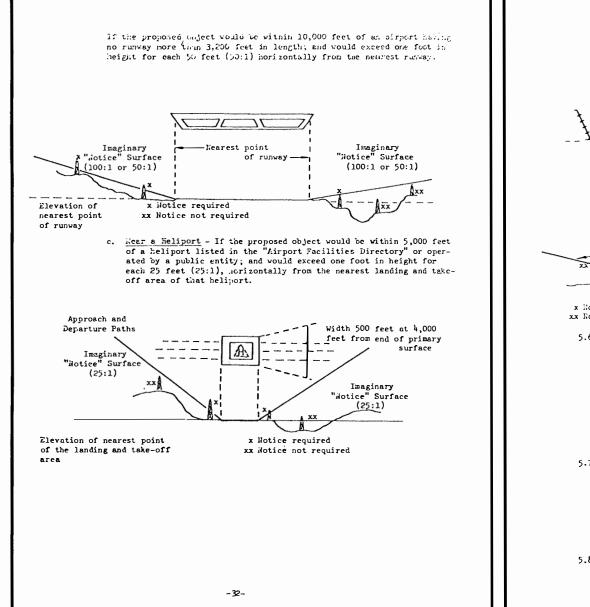
5.2 Any structure which obstructs the eirspace more than one hundred fifty (150) feet above the ground or water level, or at any height near an established airport as defined by 21-101 (c), Idaho Code, when deterrined by the Board of Aeronautical Directors or the Director of Aeronautics acting in behalf of the Board to be a hezard or e potential hazard to the safe flight of aircraft shall be plainly marked, illuminated, painted, lighted or designated in a manner approved by the Board.

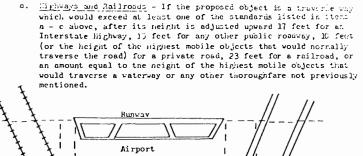
5.3 Power lines, communication lines, wires or cable more than one hundred fifty (150) feet above the terrain crossing canyons, rivers, navigable bodies of water, terrain undulations, or guy structures or at any height where such wire, cable or obstruction cross navigable bodies of water near established seaplane bases, if determined by the Board, to be a hazard to air navigation, shall be marked at 200-feet intervals of spacing oy sphere-type markers having a minimum diameter of 54 inches. Said sphere to be of the split-shell, clemp-on type which are to be alternated in three contrasting solid colors of gloss white, gloss yellow, and international orange and may be constructed of recommended light-weight materials such as fiberglass, aluminum, or foam.

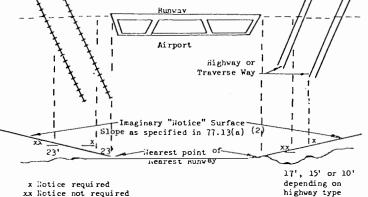
- 5.4 Long spans that exceed lengths of one-half mile between support piers, the piers shall be merked with flashing strobe or beacon lights of a type and brilliance acceptable to the Board if such is deemed pertinent to safety and recognition of obstructions.
- 5.5 Any construction sponsor is required to submit a notice to the Director of Aeronautics if his construction exceeds one or more of the following conditions:
  - a. <u>Creater than 150 feet in height</u> If the proposed object would be more than 150 feet above ground level at its location.
  - b. lear an established airport or seablane base If the proposed object would be within 20,000 feet of an airport1 or seaplane base with more than 3,200 feet in length; and would exceed one foot in height for each 100 feet (100:1) horizontally from the nearest point of the nearest runway.

1. To qualify, an airport as defined in 21-101 (c), Idano Code, must be listed in the Idaho Airport Facilities Directory, or in the "Airport Directory" of the current Airman's Information Manual or operated by a public entity.

- 31-



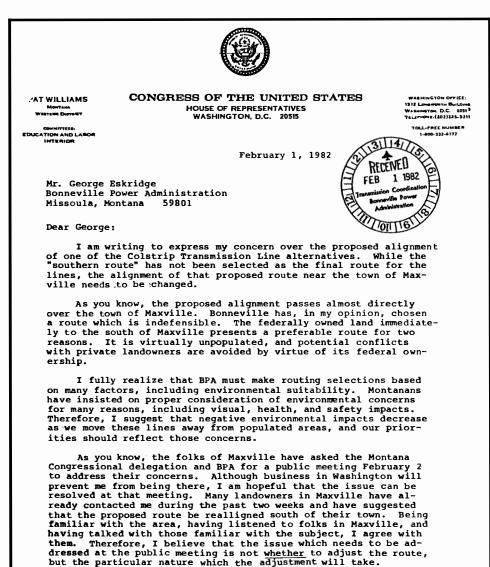




- 5.6 The notice required under item 5.5 through 5.5 d above must be submitted:
  - a. At least 30 days before:
    - 1. The construction or alteration is to begin; or,
    - 2. The application for construction permit is to be filed.
  - b. Immediately by telephone or other expeditious means, with written notification submitted within 5 days thereafter, if immediate construction or alteration is required as in cases involving public services, health or safety.
- 5.7 A notice of proposed construction or alteration is required so that the State Board of Aeronautics may:
  - a. Depict obstructions on aeronautical charts.
  - b. Recommend appropriate markings as required by 21-519, Idano Code.
  - c. Be made aware of potential aeronautical hazards in order to minimize their danger to the flying public.
  - d. Frotect the lives and property of persons in the air and on the ground.
- 5.8 Notice must be given in writing of intended construction or alteration to the Director of Acroneutics, 3103 Airport Way, Doine, John 83705.

Idaho Div. of Aeronautica -33and Philip Transportstone 3453 RICKENBACKER ST. ROYSE, ID 83705

| AMENDMENT TO REGULATION #5<br>5.9 <u>Construction or Alteration not Requiring Notice</u>   | DEPARTMENT OF (TANSPORTATION<br>FEDERAL AVIATION ADIAINISTRATION<br>DATE LIAY 2 1970<br>WASHINGTON, D.C. 2059<br>ANT-1<br>SUBJECT: Request for Obstruction Marking Deviation; ANW-530 letter<br>dated 4/19/78  |
|--|--|
| <ul> <li>No person is required to notify the Director for any of the following construction or alteration:</li> <li>(a) Any object that would be shielded by existing structures of a permanent and substantial character or by natural terrain or topographic features of equal or greater height, and vould be located in the congested area of a city, town or settlement where it is evident beyond all reasonable doubt that the structure so shielded vill not adversely affect safety in air navigation.</li> <li>(b) Any antenna structure of 20 feet or less in height except one that would increase the beight of another antenna structure.</li> <li>(c) Any air navigation facility, airport visual approach or landing aid, aircraft arresting device or meteorological device of a type approved by the Director, the location and height of which is fixed by its functional purpose.</li> </ul> | <ul> <li>A daied 4/19/18</li> <li>Front. Director, Air Traffic Service, AAT-1</li> <li>The Director, Northwest Region<br/>Attention: Chief, Air Traffic Division</li> <li>The Idaho Power Company is requesting authorization to use alternating<br/>white, yellow and orange 34-inch spherical markers on their overhead<br/>transmission lines in lieu of the standard 20-inch orange markers.</li> <li>The current marking and lighting advisory circular states that spherical<br/>markers abould be installed on the highest vire and not be lees than<br/>20 inches in diameter. Therefore, the use of larger markers, such as<br/>the 54-inch spheres, it acceptable time must also have markers that<br/>are at least 20 inches in diameter.</li> <li>If the vertical distance between the top line and the lowest line, which<br/>may be either a conductor or special line for attaching markers, does<br/>not exceed 30 fect at any point in the apan, then only the upper or lower<br/>line need be marked. If the upper line is marked it should be marked<br/>with spheres that are at least 20 inches in diameter; if the lower line<br/>is marked is should be marked with spherical markers that are at least<br/>34 inches in diameter.</li> <li>We concur in the use of alternating orange, white and yellow markers on<br/>the top line. The first and last markers should be orange.</li> <li>We are giving consideration to amending the marking and lighting advisory<br/>circular to include the larger or phere and liternating orange and white<br/>markers. However, we are not planning on including yellow under most<br/>background conditions.</li> <li>We are giving consideration to amending the marking and lighting advisory<br/>circular to include the larger or sphere and laternating orange.</li> <li>We are giving consideration to amending the marking yellow under most<br/>background conditions.</li> </ul> |



Page 2 George Eskridge February 1, 1982

In light of the controversy created by this powerline, along with the political difficulties culminating recently with the State of Montana's announcement that state land easements are contingent upon BPA's willingness to enter into an agreement governing the construction of the line, the necessity for increased cooperation is obvious.

Best regards.

Sincerely,

Williams Dat Williams

THIS STATIONERY PRINTED ON PAPER MADE WITH RECYCLED FIBERS



Department of Energy Bonneville Power Administration Transmission Coordination P.O. Box 4327 Missoula, Montana 59806

In reply refer to: ETJ-21

February 19, 1982

Honorable Pat Williams House of Representatives Washington, D.C. 20515

Dear Mr. Williams:

Thank you for your letter of February 1, 1982, expressing your concern with the Garrison-Spokane transmission line alternative through the Maxville area.

As you are aware, concerned citizens from the Philipsburg, Maxville, Hall, and Drummond area have formed the Granite County Alliance and have individually and collectively written letters to our Missoula office concerning the alternative through this area. BPA and USFS personnel attended a public meeting on February 3, 1982, organized and conducted by the Alliance to express their concerns to the two Agencies. Congressional staff also attended the meeting, including Fat Duffy of your office.

The main concern expressed at the meeting was the proposed centerline location of the environmentally preferred southern alternative through the Maxville area. The Alliance wants to have an alignment that stays away from residences by at least one-half mile, avoids visual impact on residential property, avoids concentrations of domestic livestock on private property, avoids productive farm or range land on private property, and stays entirely on public land if possible. A criteria for impact weighting was also suggested and particularly directed to a study the Deer Lodge National Forest had compiled concerning the Maxville area before the February 3 meeting.

BPA, in cooperation with the USFS, is in the process of reviewing the suggestions offered by those concerned. This review should be completed in the next few weeks.

We will, of course, keep your office informed of progress and final results of the review. Should you desire additional information anytime during our review, please let us know.

George E. Eskridge Projects Information Officer

cc: Pat Duffy, State Executive Officer Missoula, Montana

?C. Mercer Maxville Star Rt. FR 2 1982 Philipsborg, Mt. Jan 19, 1982 Dear Sir! and tax payer in am a homeowner Granite Co. Mt. I live in Maxville which is a proposed route for the B.P.A. Twin 500 K.V. PowerLine, I am strongly apposed to this Roote through Maxville because of damage and decrease In property value for now and in the future. The Granite Co. Alliance has a well planned route for the line which would be less damaging to fewer land owners. I am in favor of route South of Maxuille. this I still wonder why in a Democratic Got. of, by and for the people that such a Power Line would be forced on the public without better planning Sincerely, James C. Muren



Mr. George Eskridge Bonneville Fower Administration Transmission Coordination P.O. Box 4327 Missoula, Montana 59806

Dear Sir:

I am writing in reference to the powerline that the Bonneville Power Administration plans to construct through Granite County. I am against the construction of the entire line from Coalstrip to "ashington, and cannot agree with the methods used to obtain the rightof-way, or the complete lack of concideration for the people, who will be affected by this powerline. I also don't agree with the fact that Montana will receive no benefit from this line.

I am a member of the contact committee for the Granite County Alliance, based in Hall, Montana. We believe if the powerline must be built, it should be constructed with the least amount of damage to person and property. the Granite County Alliance has studied the proposed routes the B.F.A. plans to follow with this powerline in the Maxville, Montana area, and we believe it would be more benefical to all parties if the line could be moved farther south. This new route would involve less private property, minimize damage to agricultural land, and it would run almost entirely on government land.

We would like to have your support on this matter, and if possible have either yourself or one of your representatives come to one of our meetings and study our alternate plan.

Sincerely yours,

record Storenary Leonard J. Connors, Jr,

P.O. Box 304 Fhilipsburg, Montana 59358 Phone: Rita Conn 288-3394 br. George Eskridge Senneville Fower Administration Franchission Coordination 1. ... New A327 hissould, Actuan 19844

wear wir,

I attended the meeting in Drummond last evening so that I could become more familiar with the proposed routes of your project.

I am completely satisfied that the C D route would be the most satisfactory. I cannot go alonge with either route that would go through Lexville. By son has a small accrage in the area that would be affected (10 acres). He had plans to build on this land. If the line goes where it is layed out there will be no way that he can use this property for a home. It will make this property absolutely of no value to anyone.

Le alco live in the area, but not in Agnville. It would be no much better for everyone concerned to use the more mouthernly route.

I hope you will take these facts into consideration when making your final decision.

Sinceresy yours, Allen A. Morian

TECEIVE

Razville Stor Hote Thitipoburg, Rost and S February A, 1982

kr. George Eskridge conneville fouer usubicturation h. C. an 4325 missoult, monture 57m



Dear Sir:

After attending the meeting in brunnood last evening 1 would like to go on record as favoring the C D route through the haxville area. Of course I would prefer that it not go through this area at all out if it is decided that it go in this area the C D area would be by far the most favorable. I am very much opposed to the  $\lambda$  and also the C line. There are far too Wany homes in this area.

Ly son, und lives in Aleska now, come a little under 10 acres in this area too. I believe it will so right through his property. He has never been notified, by you that this lines is even going in this area. It will make this piece of property worth absolutely mothing. He bought it about 5 years ago and plans to build disting on it. Of course he won't be able to even build disting on it. Of course he won't be able to even build of it if this route is used. He had a hard time finding a parcel of land to buy as nobcay in this area wants to sell, or if they do the price is very high. I feel that if would be impossible to replace it. He would be a real looser if this route is taken.

I hope that you will take these facus into consideration when making your final decision.

binderely yours,

Manie- Manuer

Open Leker OLUCIAL INT CONT Jennery 29, 1983 FEB 8 1982 terened to Now Tild Schurgles Action Taken Helena, mortana ANS. ONC REPLY Dere Den Dar Schwinden Eclased are oner 300 Septences of marral Coundy perident opposed to the BPA powerline house through our County. at a recent wee ting in It gis (called on very short notice ) (a capacity crowd" Braded its Strong united a production to the BPA graposed " sauthern house" Romeally, Fackin March FI, in a letter to may bancar, the BPA expressed what could be convedered The general consensus of those in attendance: Equip powerlies with adjacent tracenthight of way have low land casts because of the previous investment in the vacant right of way. In addition to this economic consideration The commental areight would be affected by The minal difference of two adject powerlines compared to two separate lines.

production. Copes of this, lester & the accorpanying anguatures have here no b Senature Dauceus and marlene, Engree new Willein and marlenee, the mean lies. The marge County very provident and the BARK, the marge County very hope you can be open Aminel Country has preventing to Pore grading to gain from Mu phopoted consideration: we get no muser, we have premie in miles of land renored Adalar peers pubble fortendially affected \* Jarge Cabridge in missaila has the pedium Derey druly yours F.O. Bux 125 SV. Regis, Ht. Julia Row here buried underground. J9890 ; ; Clark kink Valley and he wine clore de reces and agadider costs i 'i hante underest of 524 Springs under gallow on perorig lie unilla meant regat-of puggested that the printing line along the morteen pout " he convoluted by me ped of burner (is seen the land whe DDA is buildinged it seen the land will regignere will as promise for theming the when their our burner for the coul ) puese act. The the fire must go through mind denot the is an two try racan't pegat out along the old nillumber had cut had the the in instant defaces denilly pareved, main tenier, and a propressing and neintring such medite tabits by the as the little miedlife tabits by the little curry is then human a alterations along the U When the colleg is the hearn for not reading this weard / juget - flinger of the not the method it was fuller ગુ

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We, the undersigned, residents of Mineral County, opose the proposed route of the Bonneville Powerline which would go through our county.

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| our county.                                   |                           |  |
|   | <b>:</b>                  | ,  |
| NAME  | ADDRESS                   | 1  |
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| ad Evans Sam Evans                            | PO Box 7<br>Alberton MT   |  |
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| Villiam Rosengreen William Rosengreen         | alberton, mt.             | Biy 30 8                                 |
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| Susanne Mathewan Suranne Gowan                | 435 alberton              | mt.                                      |
| Havin J. Hamiell Gany L. Hamot                | P.O. 254 alberton         | rite.                                    |
| Ulif In Pearson Alice H. Pearson              | P.O. Box 400 albe         | ton m.                                   |
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Signer. Kin. 200 the proposed route of the Bonneville Powerline which would go through 121.132 4 54 St. Chilips 10 DIXZIT AR We, the undersigned, residents of dimeral County, oppose 9. F. & SZ1 5× 17. 1300 420 Nean Veges nan St. Deg. 5 St Reajo 2 ľ Redai Reino ~ ~ 57 Regs At. Real 5 Cerus APPRESS 10e. Con : 21 بر 1 3 Ċ 7 and S. Schnelder File m iller and we ({{ CONTRACTOR OF A (ouro) Vichele Ulsodoon mucharla Fox Dar Prefat Mr. S Sluidos 5 CADNE. lain 1 termo Roberto Jalinet KIM what king ines ave jough in Pinic mar our county. Z Parkera C . بې Almer. Artma Louna SUBJ Ciro RAME 004 192 B6×269 Elt-vad By 202 XX 433 B02165 2x 325 01333 BALLS Bular 17 A1326 Berize HANA G1326 Boxat Lex 51 Bx325 かいえんろ Per 1 1505 Br 19 5 : the proposed route of the Bonneville Powerline which would to through WI worker in allieston We, the undersigned, residents of dimeral County, oppose aberton set too albertom . 143 alleton albuton alterton Riderton alburton たい alberton Kreek Meitic alberton Hlbuton AD PRESS alberton Ulton reduct 2 Ξ ر Z Péi acternor Le Lack Dicker 2 would helinion ANY duram )and all na Thenty. voces preder A Just m Deschanged. Keerdon Marin ILLer ame terul To, del いい Roci our county. ixlie M. envere Jure Stur Frain KIMMUY Still. (ruessy Ahm VIEV V JAT-120 that The me SAME: Di- SO 5

We, the undersigned, residents of Mineral County, oppose We, the undersigned residents of Mineral County, oppose the proposed route of the Bonneville Powerline which would go through the proposed route of the Bonneville Powerline which would go through our county. our County. A DDRESS NAHE RAYE ADDRESS Min Co Tairina E.1614 Guran Spotine La Bonnis Kuth 0.0. ers D IaxP") Spoka 15726 Aulibon Ruth 11 an 'n 1 ' Innis Ruth BOLZIDA md. 1) HLL .. Box ßa 73 10 R miller) , vel 80 RAX 624 Michille Smith Box 44 da. any Il ala Kehrl 646 DE Bocart B1x 630 Box 14 Do Boraia mit losson Bot 14



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Dear Mr. Johnson,

I am writing because I am concerned about one of the chosen routes for the BPA transmission line. The route ISm I'm talking about to goes through the Ninemile area and very near Alberton.Mt. I feel more truthful answers should be given about the effects of the noise on human and wildlife. Will C.B. and T.V. and radio transmission be affected? If so , this could be unsafe for people

living in the area. I object to the line going so close to residential areas. People in these areas deserve better than to have their property ruined, and their very lifestyle from which they gather spiritual strength, ruined. Why can't existing

corridors be used? Why do you have to ruin Montana for people on the west coast? Even the jobs oreated will end up going to non-local people.

I get the horrible feeling this whole project is being propelled along by and for the benefit of a handful of people. I beg you to explore every alternative and I beg you to even question the need for a line if Washington Power just cancelled

two power plant projects due to "lack of future need" (Which Montana Coop users

also have to pay for)

Please, you are a powerful entity and can set examples. Quit following the typical bureaucratic role. Be reasonable, truthful, same and kind to Montana and

its people.

Feb.4, 1982 J.C. Mercer Maxuillestar Rt. Philipsburg, Mt. R.P.H 59858 Missoula, Mt. George : After attending the Feb. 3nd meeting of B.P.H. and the Granite Co. Alliance, I find it very difficult to believe day thing you folks had to say. Inclosed is a dopicate of the letter I wrote to Pat Williams You guys should get your det together. Sincerely , James C. Mercer

Doplicate Roogh Draft ...... Box 204 Feb.4, 1982 February 5, 1982 Marville, Mt. L-MX-1-578 J.C. Mercer Representative Mn Pat Williams: Mr. George Esseridge Bonneville Power Administration Dear Sir: Transmission Coordination P. C. Box 4327 I attended the Feb. 3rd Missoula, Montana 59806 Dear Sir: -MY- 365-3-X meeting of the Granite Co. Alliance I would like to go on record as being very much opposed to your routine that would go through Maxville. I am a property owner just North of Maxville. Ehe B. P. A . and Your and I would be agreeable to your line C D that will go south of Representative attended also. Maxville if you find it necessary to construct your line in this area. ¥ I am pleased that you are -MX-030-3 . open and your will consider the number of people that this sing sould counted such and take the route south of Maxville. interested in the people over the other aspects that all Sincerely yours, the B.P.A. come up with for Mari B. Nichter put running their Twin 500 KV Marie & iliting power line through Maxville. I feel that their answers to some questions were not only Bureaucratic hog-wash but also dishonest, We are thankful for your regard that the people come first. Sincerely Jome C. Meren

THREE MOUNTAIN SMEEP group quietly on a slope in Montan's Glaclar Park, where they survive umofisited in a paradise of rock and snow. Unlast disturbed or frightened, these basuition caturg tand to show only a natural eavition and curtosity of human beings — which may account for the fact of their near attinction. Please help the FEB \$ 1982 Address Maxville residence keep B.P.A. power transmission lines George Estridge BPA P.O. Box 4327 Missoula, Montana off private property Rublic power, on public property! Thanks. Bobbie Stran

Mr. George Eskridge Bonneville Power Transmission Coordination PO Box 4327 Missoula, Mt. 59806 Dear Mr. Eskridge, The Granite County Alliance would like to express its reciation for your attendance and participation at our public meeting on February 3rd. We are encouraged to hear of your expressed willingness to explore alternative routings through the Maxville and West valley preas. It was the unanimous expression of those present that you should do this, as the routing you are currently considering is absolutely unacceptable. Enclosed please find a copy of the Granite County Alliance Statement of Position, which expresses our current views regarding the four possible routings evaluated by the Forest Service. It further proposes alternative "E", a corridor through which we believe the best routing through our area would be located. I am enclosing a map which delineates this corridor. We urge you to seriously consider a routing through this corridor, and to not merely give lip service to the idea. In this regard, we are further requesting that the BPA include language in the draft EIS to guarantee that additional lines are being reviewed in this area. Mention of the consideration of additional lines would

Enclosed please also find a letter to Charlie Eiller which contains suggestions to modify the criteria the Forest Service ID Term uses in its evaluations. The four suggested new criteriaare ones which Bonneville also needs to utilize more fully when evaluating routing possibilities through an area. These four criteria reflect our most important concern-the impact on residential and other forms of private land use.

thus legitimize such a change in the final draft.

We feel confident that our congressional delegation is willing to support us in our altempts to convince Bonneville to find a route through the Maxville and west valley ereas which evoids residential areas and avoids more private Lond. And we further believe that it would be to your advantage to take the leaderchip role in finding a more acceptable route. By so doing you would be setting a new precedent which would show that Bonneville has the ability and the willingness to respond to local citizens' concerns.

Sincerely,

adde July

Adele Furby, Chaiman Granite County Alliance

February 4, 1982

cc: Charlie Miller Evan Barrett Pat Duffy Mike Cooney

February 4, 1982

Charlie Miller Project Coordinator USFS PO Box 400, Federal Building Butte, Mt. 59703

Dear Charlie.

cc: Evan Barrets Mike Cooney Pat luffy George Eskridge Vic : tende

The Granite County Alliance would like to express its appreciation for your attendance and writeination at our public meeting on February 3rd. We expected by are encouraged to hear of your willingness to re-evaluate the criteria used as well as possible routings through the Maxville and west valley areas.

Enclosed is a copy of our st tement of position as was unanimously passed at the meeting, at well as a mer which delineates corridor "E". As you know, in our view this area deserves more review as a possible place for the line.

In light of the viewpoints expressed at the meeting, we would like to suggest that several new criteria be utilized in your future evaluation of this area. The e are:

- 1) Avoid re.idential property. We have established the principal that g mile from a residence is the minimum acceptable distance.
- Avoid visual impact on residential property.
- 3) Avoid concentrations of domestic lives tock on private property.
- 4) Avoid productive farm or range land on private property

Along with these proposed additional criteria, we propose that water quality and visual impact on other than residential property be each considered as only one criteria instead of two.

If the above changes are utilized in your evaluations, we believe that your conclusions will more adequately reflect the overall environmental impact in this area, particularly as it is felt by those citizens who live and work in this area from day to day.

We are looking forward to working some clo ely with you in the future on this re-evoluation, and feel confident that if we work together that we can come up with a proposed routing which will be more accoutable for all concerned.

incerely.

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Adele Furby, Chriman

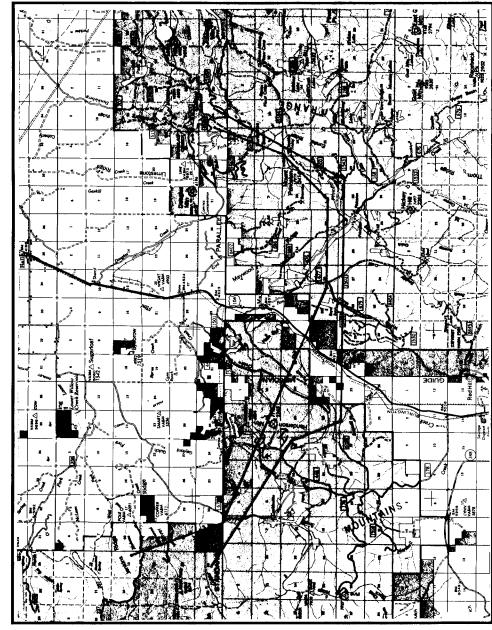
Granite County Alliance

Granite County Alliance

tatement of Polition

Regarding January 28, 1982 Forest Service I.D. Team Evaluation of Additional Alignments for the Garrison#Spokane 500kv Transmission Line through Maxville Area.

- 1. Line (corridor) E is our areferred routing area.
- 2. Line C+plus-D could be an acceptable alternative to line E provided come minor adjustments were made. Line C-plus-D does fully meet our major requirement that the line avoid residences.
- 3. Any movement to the north of line C-plug-1 would be absolutely unacceptable.
- 4. Line A is unacceptable.
- 5. Line C 1: unecceptable.
- 6. Line B way never promoted by us.



EVHE

MAR 16 1982

Ms. Adele Furby, Chairparson Granite County Alliance Star Route Hall, MT 59837

Dear Ms. Furby:

Thank you for your letter of February 4, 1982. It reinforces our understanding of the Granite County Alliance concerns about the proposed Bonneville Power Administration project as it would pass mear Maxville. We are sorry for the delay of this response; it was caused in part by our ongoing meetings on this subject. EPA, as you are aware, has been dealing with the Maxville concerns aince summer 1981, when meetings first occurred with landowners and concerned citizens in the area.

As part of this ongoing reponse to your concerns, we have discussed the situation with U.S Forest Service representatives and have attended several meetings with USFS personnel to add our information to their evaluations.

We have also held several discussions within and outside EPA, including discussions with Congressional representatives to explain the EIS process through which the agency will deal with suggested changes in the route alignments already examined in the draft document. This process is discussed below and is more comprehensively covered in the copy of the Plan for Environmental Studies, enclosed for your information.

The process, regulated by the Council on Environmental Quality, provides for full and thorough consideration of all comments and concerns of those within the study area of any given project. Scoping meetings, for instance, must be held throughout the area in the initial atages of study, ao that areas meeding attention may be appropriately identified. Such meetings were held in Drummond and Clinton, Montana, among other towns, in May of 1981. Subsequent studies and evaluations were based, in part, on information received through the meetings and comment letters submitted then. 2

When major changes such as divergent routing slternatives arise later in the process, particularly after the studies and the ranking of all routes have been completed and the EIS itself is well into draft stage, CEQ regulations allow for such input to be considered at a particular stage in the process. The responsible Federal agency is directed, by regulation, to consider euch changes and to report on all results of such study. This step takes place during the comment process: that is, during the period of time when the completed draft EIS is made available for public review throughout the study area and the country. Regulations specify the various modes of response an agency must make. To assure you that full and satisfactory response must and will be made, I enclose a copy of the "Response to comments" section from the CEQ regulations.

EFA does fully recognize the seriousness of your interest in the Maxville routings. We also recognize that reviews done by the USFS (Deerlodge) do not fully address the social impacts on private/agricultural land. We are both bound and committed to reviewing those ochocerns, but we can make no decision on further studies until the draft EIS is reviewed and the extensive studies already completed over the past two and one-half years have received the opportunity for public comment. The public comment period, to begin this month with the mailing of the EIS, will extend until May 28,1982. EFA will hold meetings throughout the study area to receive comments during the month of April and extending into May. We also expect to receive numerous written comments through our Transmission Coordination Office bare in Missoula.

The MEPA (National Environmental Policy Act) process, outlined in our Plan for Environmental Studies, then specifies that we consider and analyze all commenta made, so that concerns arising therein may be studied and responded to in the final EIS. It is most important that all concerns be heard before commitments or other decisions are made on any single segment or single concern. Only then can final studies be made, adjustments (if warranted) made, and explanations prepared to serve as the final EIS. This stage will begin during the summer; the final EIS is not expected out until fall 1982. The Record of Decision, the formal and final oblice, cannot take place until 30 days after the Final EIS is insued.

The NEPA process, which assigns certain actions to certain times, may seem cusberscare or formal. It is designed, however, to protect the interests of the public and to ensure that all concerns are given their due weight. SPA would be willing to meet with the Alliance to explein the EIS information and to suggest to the Alliance what you might best do to prepare for the Drummond meeting in April or for written comments on the draft EIS. Dan Bisenius, Team Leader, Tim Hurray, and I could most easily coordinate our schedules to meet mart week, if that suits you.

If such a meeting would be helpful, please give me a call at the Missoula office (1-800-332-2421). Thank you for your patience in meaiting our reply. I look forward to meeting with you again.

Sincerely,

'5 George E. Eskridge, Project Coordinator Missoula Coordination Office

2 Enolosures

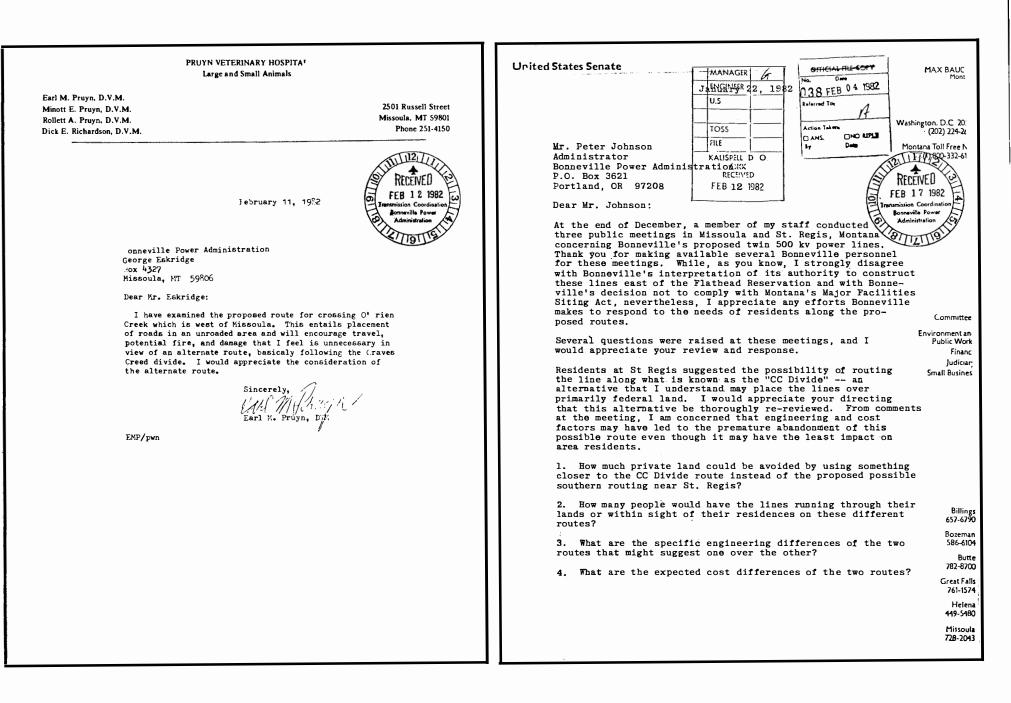
oo: Earl Reinsel - USFS Charley Hiller - USFS

Mr. Mike Cooney Honorable Max Baucus' Office

Mr. Pat Duffy Honorable Pat Williams' Office

Mr. Evan Barrett Honorable John Maloher's Office

Manelle Sun lante Philipetury, nort kerly in Ŕ C that the par ag and fear and would " mapille and to of write within a me 12 22 at a m mayelle parver line inter 3 7 due to the would an me. 50 lectron. 4. tino miles We . 2220 that the area az avore LAN L pleas the' Mu. <u>S</u> ŕ Hoe , Jocuren Hou Boule Manuele Houst. Stess the with bie Moi from tana. -rower on Public Ind. There's plenty Of blic Land close Juncerly Mr. George Eskridge B.P.A. P.O. Box 4327 Missoula, Montaria 59801 59801 Please help the people in Maxville. We want line POST CARD Ê Public Power on Public Land. There's plenty of Public land close Sincerly Tg 



Page Two

MR. PETER JOHNSON January 22, 1982

5. What are the environmental impact differences of these two routes?

6. What would be the benefits and costs of routing the lines close to the existing Milwaukee Railroad right-of-way — another possibility raised at this meeting?

Concerning the Miller Creek portion of the possible southern route, I understand that Bonneville believes that four-to-six. landowners would be able to see the power lines from their homes. Please forward to me the details.

7. Specifically, what residents in the Miller Creek area would be able to see the power lines from their homes should this route be chosen?

8. What economic impacts on each of these people and others in the Miller Creek area are foreseen? I am particularly interested in BPA's assessment of land valuation changes. People living in this area do so to a great extent because of its scenic and recreational value in relative proximity to Missoula.

9. How does Bonneville intend to compensate people who are economically damaged by land devaluations or in other ways even though: the lines do not cross their particular lands? Please explain Bonneville's mandatory and discretionary authority as well as Bonneville's past practices in implementing these authorities and any relevant court decisions.

10. What specific economic impacts has Bonneville identified to date on local governments, residents, and others in Missoula and Mineral Counties? Please explain your work to date in identifying these impacts -- particularly impacts on residents and land-owners affected by the lines, but who do not own the lands through which the lines would pass. As part of this response, please explain for me the effects the lines might have on Mineral County's law enforcement radio communications.

11. What issues and impacts have been identified at this time in the Maxville area? Please explain for me the various routes being considered in this area. I'm particularly concerned about a suggestion that has been made to me by local residents that Bonneville should more closely study a possible route approximately mid-way between Maxville and Phillipsburg that would be almost entirely on public lands. Page Three

MR. PETER JOHNSON January 22, 1982

12. What is the projected timetable at this point for Bonneville's publishing the draft environmental impact statement?

Thank you for your assistance.

With best personal regards, I am

Sincerely,

Acy Barner

Gary A. Morrison Anne M. Morrison FEB 22 9329 Turn Street CR.T.CT. Juneau, AK 99801 February 17, 1982

Department of Energy BPA Transmission Coordination Attn: Al Stocker P.O. Box 4327 Missoula, MT. 59806

Dear Mr. Stocker:

We are hereby <u>refusing</u> you entry onto our property for any activities associated with the Garrison-Spokane Project.

The Dept. of Energy (BPA), any cooperating government agency or any private contractor associated with the afore mentioned project are hereby notified that they will be subject to arrest for trespass if they enter our property in Section 4, T8N, R 13W, Granite County, Montana.

We have a number of reasons for our refusing your request at this time. They may be helpful to your agency in future dealings with the public - hopefully in a more civil manner.

1. Your agency has been working on the EIS for this project for well over a year. You could have very easily researched all potentially affected land owners at that time and involved them in all phases of the scoping process, in development of the DEIS, in identifying public issues and in the initial development of alternatives. You did not do this and it is very disturbing to us as intimately affected land owners.

2. You write to us at this very late date, do not ask our involvement in the project, but rather simply come to us "hat in hand" expecting us to give you full cooperation as you prepare to rape the small piece of land we consider so very important.

3. We are in absolute, total disagreement with your proposal to place this facility over our porperty. This refusal of entry is one of the small ways by which we intend to protest your proposed action.

We have been planning for years to eventually construct our retirement home on this small piece of land. As you well know, the activity you propose is an irreversible and irretrievable commitment that will render this nine acres totally useless for this and any related activities. There are very few long-term activities undertaken by humans that have such a devastating adverse affect on the environment as a 500 kV power ''ne (and the strong possibility of future lines adjacent).

(Stocker letter) page 2



In summary, I was born and raised in the Maxville area, know the land intimately, and could have been consulted and involved in work on this project to develope good viable alternatives that would have been acceptable to us and other Maxville residents and land owners. You have chosen to ignore us until now when you find yourselves in need of our cooperation. You are not going to get this cooperation. In fact, you are now facing a fight every step of the way on this project.

This property is in joint ownership, in future correspondence please address both owners.

Good Luck,

Garv A. Morrison Anne M. Morrison

cc: George Eskridge, BPA Senator John Melcher Senator Max Baucus Representative Pat Williams Marvin Dagel, Granite Co. Sheriff



Feb. 21, 1982 116 10th Ave. S. Mt. Vernon, Iowa 52314

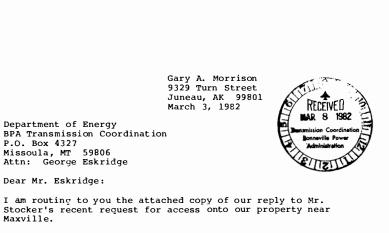
Bonneville Power Administration Transmission Coordination P.O. Box 4327 Missoula, Montana 59806

Sire

Regarding your letter of February 5, 1982 I am extremely upset by the possibility that a 500-kV transmission line is proposed to cross my property in Missoula County. The property is first and foremost a recreational acreage (but with no timber potential) and nothing could be more distasteful to me or any future owner than a power line crossing the property. The distinct implication in your letter is that should this rcute be selected I will in some measure be compensated by means of an easement. Though the route is planned to cross only the northern edge and northeast corner of the property its value to me or any one else is diminished to virtually zero--it might as well run through the middle. I therefore insist that should this route be the final one that I be compensated fully for the entire fair market value of the property.

Sincerely, Viend L. Lyon

Congressman Pat Williams co: Senator John Melcher Senator Max Baccus



We feel your department (public involvement ?) is primarily at fault for the current strong adverse feelings towards the Garrison-Spokane Project in the Maxville area.

Gary A. Morrison

P.O. Box 4327

Maxville.

Gary A. Morrison Anne M. Morrison 9329 Turn Street Juneau, AK 99801 February 17, 1982

Department of Energy BPA Transmission Coordination Attn: Al Stocker P.O. Box 4327 Missoula, MT. 59806

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3. We are in absolute, total disagreement with your proposal to place this facility over our porperty. This refusal of entry is one of the small ways by which we intend to protest your proposed action.

We have been planning for years to eventually construct our retirement home on this small piece of land. As you well know, the activity you propose is an irreversible and irretrievable commitment that will render this nine acres totally useless for this and any related activities. There are very few long-term activities undertaken by humans that have such a devastating adverse affect on the environment as a 500 kV power line (and the strong possibility of future lines adjacent). page 2 (Stocker letter)

In summary, I was born and raised in the Maxville area, know the land intimately, and could have been consulted and involved in work on this project to develope good viable alternatives that would have been acceptable to us and other Maxville residents and land owners. You have chosen to ignore us until now when you find yourselves in need of our cooperation. You are not going to get this cooperation. In fact, you are now facing a fight every step of the way on this project.

This property is in joint ownership, in future correspondence please address both owners.

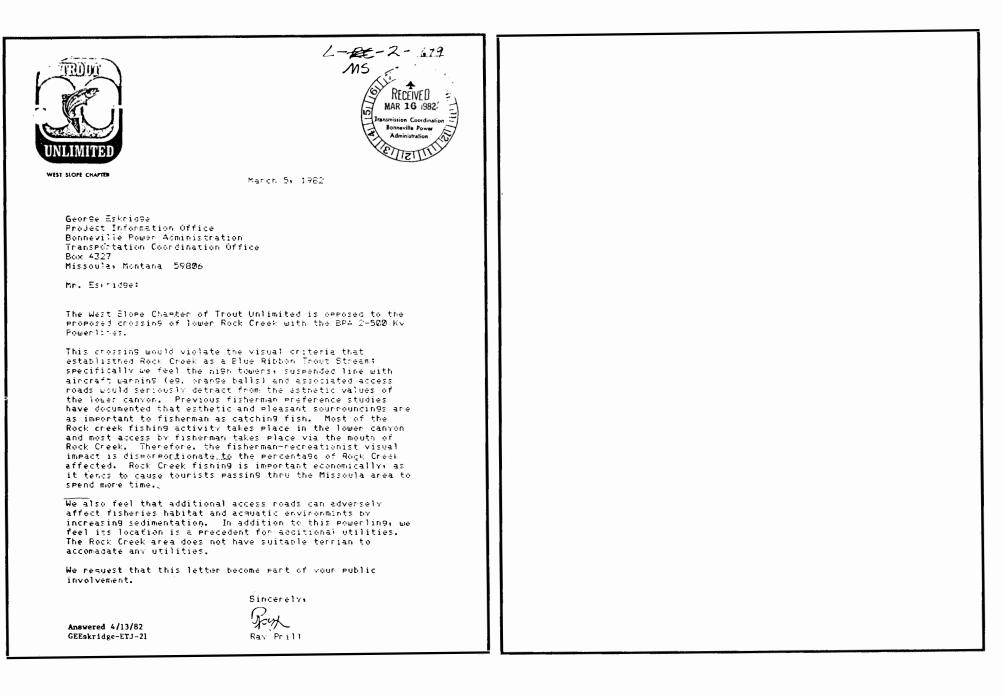
Good Luck,

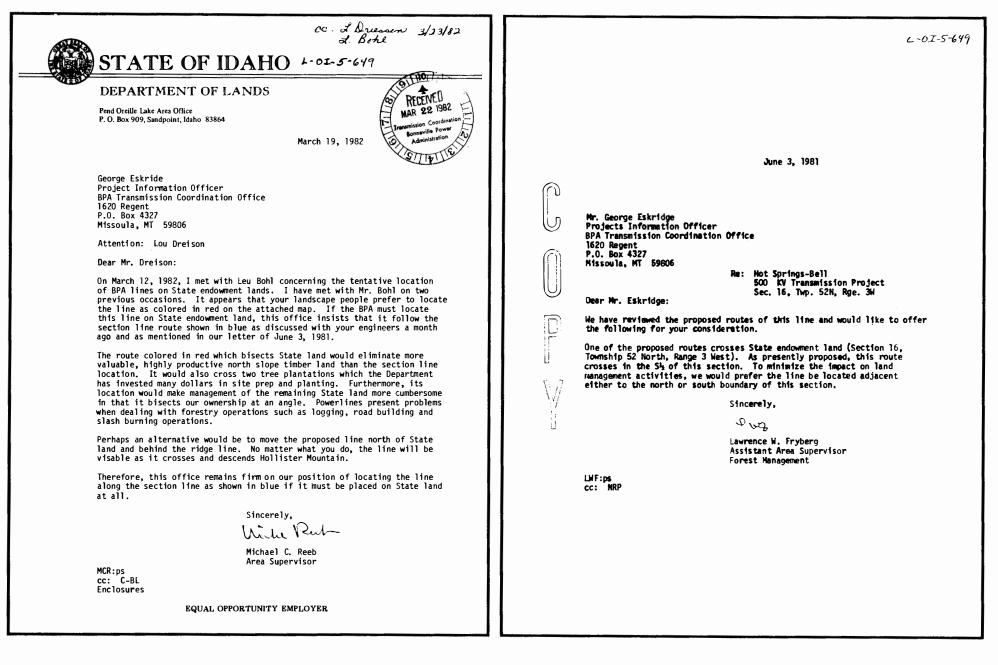
Gary A. Morrison Anne M. Morrison

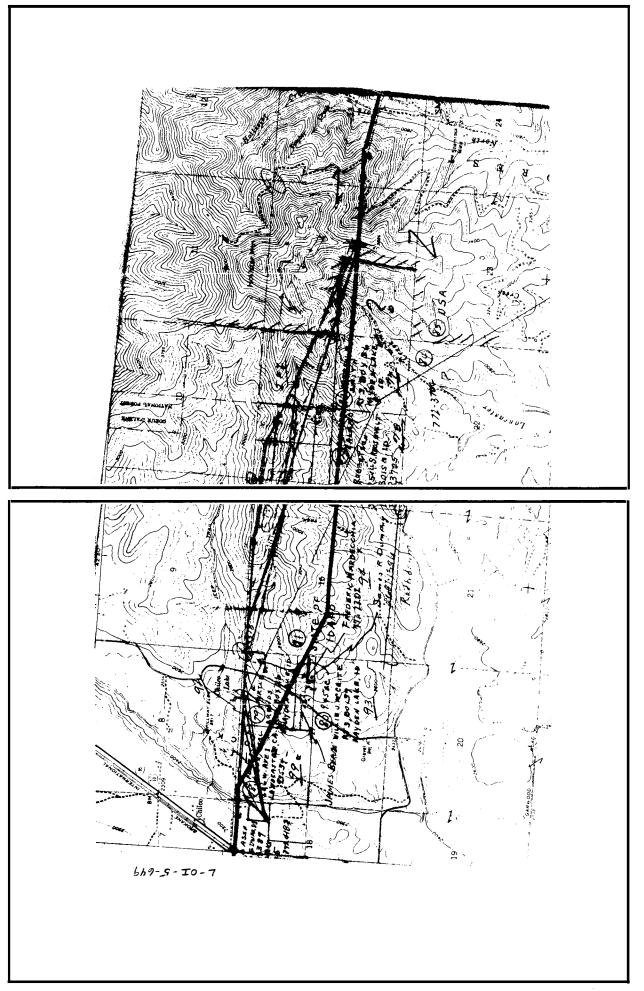
cc: George Eskridge, BPA Senator John Melcher Senator Max Baucus Representative Pat Williams Marvin Dagel, Granite Co. Sheriff

- 1 -

L-MB-2- 688 american fisheries society american fisheries society MONTANA CHAPTER MONTANA CHAPTER 134 River Pines Road Missoula, MT 59801 February 24, 1982 Mr. George Eskridge Project Information MAR 1 1982 Bonneville Power Administration Whereas the Bonneville Power Administration study team is considering the Transportation Coordination Office placement of two 500-KV powerlines across Rock Creek near Clinton, Montana, Box 4327 Ronneville Power and Missoula, MT 59806 Administration Whereas Rock Creek is designated a Blue Ribbon trout stream by the State Dear Mr. Eskridge: of Montana, and The enclosed resolution documents reasons for the Montana Chapter, American Whereas the criteria for designation as a Blue Ribbon Trout Stream includes Fisheries Society' opposition to the proposed crossing of lower Rock Creek the four criteria of public access, recreation opportunities, aesthetics, with the two BPA 500 KV powerlines. and trout productivity, and We do not feel the adverse significance of the visual and sediment impact Whereas tower access roads, tower pads and construction of such a powerline has been adequately evaluated. The Rock Creek fishery is among the most would threaten to add additional sediment to Rock Creek, and nationally recognized and important in western Montana. Visitors from most States in the U.S. annually visit this stream. Its relatively undeveloped Whereas the proposed powerline and towers would be massive intrusions on character is symbolic to many visitors of the Rocky Mountain West. the near natural aesthetics of Rock Creek canyon, and As a professional society representing Fisheries Biologists and other pro-Whereas the impact of this powerline would seriously degrade the experience fessionals working in fisheries science, we feel that the other corridors do for fishermen and other users of this nationally recognized stream, not have the significance to fisheries habitat and values as this route does. Therefore be it resolved that the Montana Chapter of the American Fisheries Regardless of what route is chosen, professional fisheries expertise at the Society strongly opposes the routing of such powerline and establishment of local level should be involved in design of streamcrossings and review of a corridor across Rock Creek. construction activities. Mitigation opportunities should be identified and incorporated into the project. Would you please include this letter and resolution as part of the record in your EIS process and include us on your mailing list for additional information. GREG L. MINTHER. President Montana Chapter, American Fisheries Society CLM/sm Enclosure







Granite County Alliance March 22, 1982 Ś

Mr. George Eskfidge Bonneville Power Administration Transmission Coordination PO Box 4327 Missoula, Montana 59806



## Dear George:

We would like the following information to help us more effectively comment on the Draft EIS of the Garrison-Spokane twin-500kv powerline. It is important that we receive this information well before the public meeting no that we can prepare comment for the meeting:

1. A list of specific source reports, source maps, work maps, previous studies, and consultant studies used as data base for the Flint Creek Valley area. (p. 5,6 of App A)

2. Aerial photos covering route segments 130, 131, 132, 133, and 134. (p. 5 of App A)

3. Jones and Jones Visual Impact Studies used for the Flint Creek Valley area data base. (App C, Visual Quality)

4. SCS County Soil Unit Maps used for the Flint Creek Valley area data base. (App C, Land Productivity: Agriculture)

5. Montana Statewide Cooperative Land Use Maps used for Flint Creek Valley area data base. (App C, Land Use/Land Cover)

6. 1 full-scale unaltered UGGS AMS 502 Series map including Flint Creek Valley area. (App C)

7. Segment by segment totals for resource data, impact potential, and technical data by individual category for segments 130, 131, 132, 133, and 134. (breakdown by segment of tables 2.2, 4.3, and 2.1 of EIS)

8. Scoping meeting comments used to delineate Garrison-Missoula study area. (p. 2 of App A)

9. Review comments and field reconaissance analyses used to locate route segments 130, 131, 132, 133, and 134 in the Southern corridor. (p. 8 of App A) 10. Impact information forms for multiple routing option. for segments 130/131 and 133/134. (p. 11 of App A)

ll. Copy of file report Data I tem Definitions and Sources, J. G. Marcotte, 1981, BPA. (p. 6 of App A)

12. Name of subcontractor in charge of contacting landowners on southern route and his reports of contacts and dates of contacts in the Flint Creek Valley area of the southern route.

13. Copy of May 12, 1981 flyer announcing Garriaon- pokane coping meeting . (p. 5 of Att 1 of App A)

14. List of parties to whom May 12, 1981 flyer was sent. 15. List of newspapers and dates of publications of notice

of May 18 scoping meeting in Drummond. (p. 2 of Att 1 of App A)

16. List of names of individual residents of the Maxville area meeting with BPA on July 7, 1981. (p. 6 of Att 1 of App A)

17. A list of source data used for graphs illustrating evaluation criteria in Attachment 4 of Appendix A.

18. Data on miles of new access roads for segments

130, 131, 132, 133, and 134. (p. 4-19 of App D)

19. Council on Environmental Quality (CEQ) Regulations for Implementing the Procedural Provisions of NEPA.  $(\frac{1}{2})$  of  $\Lambda_i p A$ )

20. Estimated landowner densities for segments 130, 131,

132, 133, and 134. (p. 4-17 of App D)

21. BPA's base data regarding numbers of individual residences located within  $\frac{1}{2}$  mile of route segment 132.

The references in parantheses are to locations in the Draft EIS where the requested information is referred to. Thank you for your help.

cc: Pat Duffy Evan Barrett Mike Cooney

Very Truly Yours, F. Lee Tavenner

assistant chairman Granite County Alliance ETJ-21

March 25, 1982

F. Lee Tavenner, Assistant Chairman Granite County Alliance Star Route Hall, Montana 59837

Dear Mr. Tavenner:

Thank you for your letter of March 22, 1982, requesting additional items you feel are needed to assist in your review of the recently issued Garrison-Spokane 500-kV Transmission Project Draft Environmental Impact Statement (EIS).

Following is a brief discussion of each item requested.

- All of this information is in the Draft EIS and appendices. The most comprehensive list is in the reference section of the Draft EIS--Section VIII, Pages 1-18. Also appropriate footnotes have been used throughout the studies to provide proper reference. Attached is a copy of "Data Item Definitions and Sources" which explains in detail sources for data, including that presented in Appendix C--May Volume.
- 2. A number of air photo producta have been used in preparing the Draft EIS and are available for your review at our Missoula office. Copies of the air photos can also be purchased. (Color air photos, approximately 1 inch = 2,000 feet scale, cost \$3.50 per photo to reproduce 49 photos which cover the segments you mentioned.) Additionally, map and air photo information will be available for review at open house sessions preceding each public comment meeting.
- We are providing: <u>Measuring the Visibility of High Voltage Transmission</u> <u>Lines</u>, Jones and Jonea, 1978; and <u>Visual Impact of High Voltage Trans-</u> mission Facilities in Northern Idaho and Northwestern Montana (with maps at 1:125,000 scale), Jones and Jones, 1976.
- 4. The maps referred to are large scale black and white air photos used by the Soil Conservation Service to define soil mapping units. These mapping units are mapped directly onto the photos based on field work done by SCS soil scientists. Certain soil units have been determined to be farmland that is prime, unique or of statewide importance, as listed on separate files at the SCS offices. For Granite County, BPA personnel visited the SCS District Office at Philipsburg and, using the

actual field photo maps, mapped prime and statewide important soil units onto the study area base map. We did not acquire copies of this information. Any questions regarding use or availability of the SCS photo maps or other interpretive information can be answered by Troy Buchanan, Acting District Conservation Officer, in Philipsburg at 859-3291.

5. The Montana Statewide Cooperative Lend Use maps are moderate scale (1:100,000) land use/land cover maps, by county, published by and available from the Montana Department of Community Affairs in Helena for a nominal fee (\$1 for the first map and \$.25 for additional maps).

6. Provided to you at no cost.

7. We are providing you computer printouts which indicate the amounts of each mapped resource data item encountered, by segment, in both miles and acres for the five segments you listed.

No separate figures were compiled on "impact potential." The information presented in Table 4.3 (Potential Impacts) and Table 2.2 (Data Summary) are merely different aggregations of the mapped resource data measurements on the printouts discussed above. These printouts display the resource information by segment; Table 4.3 aggregates the information by groups of segments between intermediate substations for all feasible combinations; and Table 2.2 summarizes the same information in terms of the top-ranked route(s) for each plan-of-service.

The following table should provide the requested segment breakdown of technical data from Table 2.1:

| Segment | 1 Circuits        | Length<br>(Miles) | Right-of-<br>Way (All<br>new non-<br>parallel) | Access<br>Require-<br>ments<br>HML | Sub-<br>station<br>Require-<br>ments | Cost<br>(Trans-<br>mission) |
|---------|-------------------|-------------------|--|------------------------------------|--------------------------------------|-----------------------------|
| 130     | Double<br>Circuit | 14.5              | 14.5   | See<br>Printout<br>Provided        | No sub-<br>station<br>associated     | \$12,324,241                |
| 131     | Double<br>Circuit | 14.8              | 14.8   | With<br>Item #18                   | directly<br>with these<br>segments.  | \$12,576,128                |
| 132     | Double<br>Circuit | 1.5               | 1.5  |                                    | Garrison<br>Substation<br>to the     | \$ 1,132,075                |
| 133     | Double<br>Circuit | 16.4              | 16.4   |                                    | east.                                | \$13,769,811                |
| 134     | Double<br>Circuit | 16.8              | 16.8   |                                    |                                      | \$14,105,660                |

2

8. The following sources of comments and analysis of the comments are available. Verbatim transcripts were taken of all scoping meetings held in Spring 1981. This information is available for your review in our Missoula office or you may purchase copies of each transcript from Cavanaugh, Martin & Associates, 199 West Pine Street, Missoula, Montana (\$.50 per page). 3

The other sources we have provided to you at no charge (attached). These are summaries that our staff prepared based on study and review of the transcripts and comment letters. They are:

- 1. A basic outline of the comment analysis method used;
- A statistical outline of comments derived from the meeting transcripts and comment letters showing the frequency of comment by area;
- Summaries of each comment from the meeting transcripts coded by town and page;
- 4. Summaries of comments from the comment letters coded by author;
- Copy of the August 1981 mailer containing the summaries of all issues derived from the comments.
- 9. "Review comments" refers to those comments gathered at the scoping meetings in March 1982 which pertain to the corridors presented for public review at that time. Comments about specific corridor locations that addressed specific problems encountered within the corridor were considered in locating alternative routes. The information provided under Item #8 above would contain any specific comments considered.

The process used to locate the referenced segments involved synthesizing a wide variety of information. It included intensive study of all data and impact maps (Appendix C); field review and study; evaluation and interpretation of air photos (Item #2); and discussion and review with agencies and the public (EIS review process). There is no specific "product" that documents this synthesizing process.

10. We are providing copies of route option ranking forms used to compare segments 130/131 and 133/134. The nature of the comparisons is detailed further in Appendix A. Attachment 3. These particular route comparisons are summarized in Figure 17 and Figure 18 as Local Routing Alternatives 10 and 11 respectively in this attachment. The tables in these figures contain the final ranking for each of 12 resource topics considered in the comparison. The forma we are providing document the factors considered in making the rankings. Each resource analyst filled out a form for each local Routing Alternative and summarized his rationale for the ranking.

- 11. Provided. (Also see Item #1)
- 12. There is no subcontractor associated with this activity along these segments. BPA has contacted people along each segment over the past 8-10 months. The specific contacts and nature of their discussions are not available at this time. BPA must obtain written approval of each party concerned prior to release of this information. This must be done to fully protect the rights of all parties involved.

4

- 13. The May 12, 1981, flyer is provided.
- 16. The May 12 announcement was sent to all those on the mailing list that was current on that date. This information is available and may be obtained for the cost of reproducing the list.
- 15. The list of newspapers and dates of publication of the Drummond meeting notices is provided.
- 16. Sce Item #12.
- 17. The bar and pie charts used to illustrate how the three plans compare for the evaluation criteria were based primarily on the resource data item information including that provided under Item #7. These illustrations are merely graphic representations of route data shown in Table 2.2.

Representative data items were chosen for each criterion and graphed. These are listed either in the boxes to the left of each graph or in the title and further explained in the text.

| Criterion |                                       | Representative Data Items  | Source  |  |  |
|-----------|---------------------------------------|--|---|--|--|
| 1.        | Residential,<br>Inhabited             | Developments, communities<br>within ½-1 mile; residences<br>within ½ mile          | Provided as<br>Item ∛21.  |  |  |
| 2.        | Agricultural<br>Land                  | 18.1 Irrigated Agriculture<br>18.2 Nou-irrigated<br>Agriculture<br>17.5 Range Land | On printouts<br>(Item #7) as data<br>item number as shown<br>opposite. Also see<br>Data Item Definitions<br>(Item #11). |  |  |
| 3.        | Intensively<br>Managed Forest<br>Land | Intensively Managed Forest<br>Land   | Secondary analysis<br>product by forestry<br>analyst. Map on file<br>in Portland. Segment<br>data as follows:           |  |  |
|           | Segment                               | Miles Intensively Managed Forest   |   |  |  |
|           | 130                                   | 5.2  |   |  |  |
|           |                                       |  |   |  |  |

| Cri | terion                              | Representative Data ltems  | Source  | Ci                   | riterion   | Representative Data Items   | Source  |
|-----|-------------------------------------|--|---|----------------------|--|---|---|
|     | <u>Segment</u><br>131<br>132<br>133 | Miles Intensively<br>4.4<br>0<br>4.4   | Managed Forest  |                      | Environmentally<br>Sensitive Arcas   | Environmentally sensitive<br>areas shown on EIS Fig. 2.5<br>as crossed by routes.                                   | See ElS Fig. 2.5.<br>Text in Appendix<br>explains how thes<br>arezs were determ                       |
| 4.  | 134<br>Lives/Lifestyles             | 7.6<br>25.1 + 25.2 Public Land<br>25.3 Indian Reservation<br>25.4 Private Land   | On printouts<br>(ltem #7) as data<br>item number as shown<br>opposite. Also see<br>ltem #11.  | 9.                   |  | Miles of route parallel to<br>existing corridor   | Technical conside<br>under "Right-of-W<br>showm on table 2.<br>in ElS and as pro<br>in table (ltem #7 |
| 5.  | Scenic/Esthetic                     | 29.1 + 29.2 Visual Quality<br>30.3 Visual Compatibility<br>31.1 Viewer Exposure<br>32.1 Visual Sensitivity   | On printouts<br>(ltem #7) as data<br>item number as shown<br>opposite. Lower graph<br>was a composite wherein<br>maps (See Appendix C)<br>of 29.1/29.2 and 30.3<br>were combined to yield<br>"Landscape Alteration";<br>and 31.1 and 32.1 were<br>combined to produce<br>"Viewer Characteristics" | c<br>ni<br>a         | Corridor Constraint areas<br>shown on EIS Fig. 2.5 as<br>crossed by routes.<br>See EIS Fig. 2.5.<br>Text in Appendix A<br>explains how the are<br>were determined. |   |   |
| 6.  | Cultural Resourc                    | es<br>High Site Potential  | Secondary analysis<br>product by cultural<br>resource analysts.<br>Map on file in Portland.<br>Segments 132 and 134<br>each cross ½ mile of<br>land where potential<br>for occurrence of<br>cultural site is high.  | 1<br>c<br>c<br>19. A | ines are paralleled,<br>ases. Other situati<br>learing access roads<br>copy of the CEQ Reg   | 4 miles<br>4 miles<br>by no means confined to situ<br>but often access requirement<br>ons could include areas where | ts are low in such  |
| 7.  | Natural<br>Resources                | <ul> <li>8.2 Municipal (Water-<br/>sheds)</li> <li>10.1 Big Game Sensitive<br/>Habitat</li> <li>12.1 Bald Eagle Wintering<br/>Areas</li> <li>17.4 Forest Land<br/>Problem Soils</li> <li>High Access Requirements</li> </ul> | On printouts (Item #7)<br>as data item number<br>as shown opposite.<br>Secondary analysis<br>product by geology/<br>soils analyst. Map<br>on file in Portland.<br>Segment 130 crosses<br>.6 mile problem soils.<br>As provided in table<br>(Item #7) and for<br>Item 18.                          |                      | egment<br>130<br>131<br>132<br>133<br>134  | High Moderate Low<br>14.5<br>14.8<br>1.5<br>16.4<br>16.4  |   |

7

21. The estimate of number of individual residences within ½ mile of all segments, as well as the number of communities within ½ miles, was made by review of the 1 to 2,000" color aerial photos flown in spring/summer 1981. Individual buildings, small groups of buildings and obvious communities were counted to either side of the routes within the above distances without regard to possible topographic or vegetative screening. The results were not field checked. For segment 132, 14 residences were counted, and treated as a single community.

I hope this information and data provided will assist you in your review. Please contact me if you wish to obtain those items for which there is a charge.

Thank you for your interest in this project.

Sincerely, ORIGINAL SIGNED BY GEORGE E. ESKRIDGE

George E. Eskridge Projects Information Officer

Enclosures

cc: Mr. Patrick Duffy Honorable Pat Williams' Office Missoula, Montana

Mr. Evan Barrett Honorable John Melcher's Office Butte, Montana

Mr. Mike Cooney Honorable Max Baucus' Office Butte, Montana 1.-SR-1-1 L-SR-1-58

March 24, 1982

# Retyped from Original Letter

Open Letter to the Missoulian

Editors:

It is my understanding that almost 6 years ago, the Montana Board of Natural Resources and Conservation approved a powerline route through the Flathead Indian Reservation to the Hot Springs Substation. When Montana Power could not gain access across the reservation Bonneville Power was drawn into the picture. But rather than trying to obtain right-of-way across the reservation, BPA (exceeding its authority, according to many) came up with an entirely new "southern route," thru the Clark Fork Valley, unapproved by the state.

As a result, the state sued and won the right once again to consider whether the BPA's plans meet the Major Facilities Citing(sic) Act, no small task.

Montana Power is now "pointing a gun" at the board, threatening that any delay in building the line could cost the ratepayers up to \$40 million a month. What do you call this, blackmail or extortion?

As Sam Reynolds stated in his editorial:

"The delay is not the state's fault . . . the fault lies with Bonneville for attempting to ignore the standards set by the state's Major Facilities Citing(sic) Act. It could have set about complying with the act two years ago, but it distained(sic) doing so."

Let BPA pay for the delay!

Then the state is told to consider the line in segments when proper evaluation involves the full length of the line. This study could not be completed "before the end of the year," according to the director of the Dept. of Natural Resources.

Montana Power and Bonneville created this nightmare--they better let the state they plan to deface have all the time it needs to consider it's defigurement(sic).

 $\ensuremath{\mathsf{Thanx}}(\ensuremath{\mathsf{sic}})$  Robert Deschamps and other opponents for raising many important issues.

Thanx(sic) Sam Reynolds for your concise outline of this complicated mess, and your editorials opposing it.

When will the public hearings be, on whether the BPA's plans comply with the state Major Facilities Citing(sic) Act?

Yours truly,

/s/Leonard W. Smith /s/William C. Ross P.O. Box 125 St. Regis, MT 59866 L-OW- 5-2

FAA Building King County Int'l Airport

Seattle, Washington 98108

US. Department

of Transportation Federa I Aviation Administration Northwest Mountain Region Colorado, Idaho, Montana, Oregon, Utah, Washington, Wyoming

March 24, 1982

Mr. George Eskridge 8onneville Power Administration Transmission Coordination Office P. O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

We have completed our review of the Draft Environmental Impact Statement (DEIS) for the Garrison-Spokane 500-kV Transmission Project and have the following comments.

Although Appendix C Map Volume identifies the locations of airports in the vicinity of the various alternative routes, the text of the DEIS does not discuss how those alternatives might impact airports.

Our primary concern relates to construction of obstfuctions in the vicinity of airports. As several of the alternative routes appear to pass quite close to airports it may be necessary for the Bonneville Power Administration to complete and return to FAA the enclosed FAA Form 7460-1, Notice of Proposed Construction or Alteration, for each location that meets the Paragraph 77.13 criteria. If you have any questions pertaining to these comments, please contact Mike Crader at FTS 396-2633. Thank you for the opportunity to review this DEIS.

Sincerely, Henry & Dil. George L. Buley

George K. Buley Chief, Planning and Programming Branch, ANW-610

Enclosure

cc: Ted Melland Bill Hamilton Worthie Rauscher Michael Ferguson

March 2011, 1952 433 Bermont & #405 Seattle , ils stimpton 98102 Mir. George Eskridge. Bonnevice Power ann. Reporto E.J. - 21 TR AFD Kran-12 P.O. Bat 4307 Mussoula, Montana. 59806 Dear Mer Eskerid ye :: Inercover from the Department denirgy a notice that Bonneville Power administration plans to build a new 500-K.V. Fransmission facility from a proposed constation in Bernson montana to Beck Substation, in Spoteane. The proved for ation of the transmission whe ourses a portion of my property an Section 5, Jourship 8 Morth Range 13. webt, Granite County, Montana. M.E. 05 48, 0.5 49. The Demeral Information Barys The Corner can continue to use the kaned under the Lines for nor mal agreculture purposes, wat I would live information about the gensicility & putting a Juin 500 KV powertine deriction of buer my mining proserty. In nicestand that most Thinks and electric beasting caps nace and I wonder if the powerline would asked thus The Line will follow one of the patential corridors server in the attacked map. The. final noute decesion will be much after the final route decision wells we shall apple when Environmental Inpact Stationent is school in the Fail of 1952. I conderstand you are contemplating the Fail of 1952. Sconderstand gove de contemplating a route further south and govered to the gover prefer that the formation of your since he gover Lieners L'. Capies

L-OW-1-6

L - SK - 1-3 3/25/52 STATE OF IDÁHO Mr. See. Estadye B. P.A. T.CC. Bix 4327 Mussele, Mart 59806 MILITÁRY DIVISION P.O. BOX 45 BOISE, IDAHO 83707 IDAG-SF 23 March 1982 Leer San I here just preshed reading your F.I.S. Summers on I here just preshed reading your F.I.S. Summers on the proposed 500 K.V. Correction of phone Project and find that you have almost in helly enclided or metamatical the entent and propose of the Makimat Concercompanish Policy cost regarding such stelement regarding such stelement to submit a delement authoring indicat the implest, goed and back, that your project will have an the environment; is the secles, waterstud, have an the environment; is the secles, waterstud. Vier Sin-Department of Energy Bonneville Power Administration P.O. Box 3621 Portland, OR 97208 Gentlemen: We have reviewed the Draft Environmental Impact Statement for Spokane-Garrison 500 kV Transmission line. The routes will have no effect on Military Division operations or streams, air, agricultural i foriest load, will life, human life ele that the transmussion line article facilities. We will be happy to forward documents on to another reviewer if you have any unfilled requirements. you have not done so histian you have taken you have not done so held us suchst we already a page and a quarter to bell us suchst we already know; that is of your did not thild the time this such inaction would have me offect on the FOR THE ADJUTANT GENERAL, IDAHO: RICHARD H. BROWN, P.E. LTC, CE, IDARNG Facilities Management Officer inversement addice wer except advertely concrete by Harry Truly Starley / Kinstel Box 778 & At 12 Spetiere, la 99203 EQUAL OPPORTUNITY EMPLOYER

**VI-74** 

Granite County Alliance March 29, 1982 8

Mr. George Eskridge Bonneville Power Administration Transmission Coordination PO Box 4327 Missoula, Montana 59806

### Dear George:

Thank you for your prompt response to our March 22 request for additional information for reviewing the draft EIS. We also appreciate the opportunity for me to review this material with Jay Marcotte on Friday, March 26 at your office in Missoula. This review with Jay will prove helpful to us an we continue to review the draft EIS material. My thanks to Jay and to Tim Murray and you for making that meeting possible.

After a review of the material you supplied and with regard to the meeting with Jay, we request the following additional information. Jay and I have discussed many of these items, and he is anticipating this request.

A. Impact summary forms for segments 130, 131, 132, 133, and 134. (p. 10 of App. A)  $\,$ 

B. An enlarged-to-scale clear mylar overlay of at least a township of section lines for the Garrison-Missoula study area.

C. Segment by segment totals for data items 17.1, 17.2, 26.1, 40.1, and 40.2 (Land Use:Urban, Land Use:Dispersed, Undev/Subdiv Land, Dev/Communities, Residences) for all segments in the Garrison-Missoula study area. (your response #7, # 21)

D. Dates of data collection for data items 40.1 and 40.2 (Dev/Communities, Residences) and date that the 14 individual residences in segment 132 were counted as 14 individual residences. (your response # 21)

E. A list of those data items and units of measurement for which computer measurement totals were given in units other than miles.(your response # 7)

The "Data Item Definitions and Sources" is very helpful

in listing the principal source maps used for the resource data base. As Jay explained, there are some miscellaneous source materials not listed in "Data Items Definitions and Sources" that were used as part of the data base. He has offered to assemble a list of those miscellaneous items for a limited number of resource areas where such miscellaneous items appear important to our review. We appreciate his helpfulness and will try to keep our requests to a minimum. However, we would appreciate:

F. A miscellaneous source list for the Urban/Land Use data base.

G. A miscellaneous source list for the Agricultural Productivity data base.

Considering your response to items # 12 and 16 and the disclosures in Attachment 1 of Appendix A, we have reservations with regards to the extent of your past meetings and contacts with Maxville residents. From discussions with Maxville residents and area landowners, we are convinced that BPA's efforts to contact people in the area have been almost non-existent. Any evidence to the contrary that you could provide would be of interest to us. In this regard please send:

H. The mailing list as it read on the date of mailing of the May 12, 1981 announcement. If the mailing list is available as it read for some other time between May 12 and release of the draft EIS, we would appreciate that list as well.(your response #14)

I. A list of the people who attended the Drummond sco; ing meeting May 18, 1981.

Also, we request:

J. A list of sources for miles of access requirements detailed under computer printout for data items 31.1, 31.2, and 31.3 (Access Req). Also, please list sources(other than analyst if any) for miles of access requirements as listed in route option ranking forms for socioeconomic.(your response # 18, 10)

K. The Granite County Montana Statewide Cooperative Land Use map. (your response # 5)

L. Please make your secondary analysis maps for Intensively Managed Forest Land(3), Cultural Resources High Site Potential(6), and Natural Resources Problem Soils(7) available at your Missoula office. (your response # 17)

Please include a bill for items costing money. Thank you.

cc: Pat Duffy Evan Barrett Mike Cooney

Very Truly Yours,

assistant chairman Granite County Alliance

F. Lee Tavenner, Assistant Gaiman Granite County Alliance Star Route imill, Hontana 55837 bear fir. Savenner: Thank you for letter of March 29, 1982, requesting additional information to assist your review of the Garrison-Spokane 500-kV Aransmission Project Draft Environmental impact Statement. Following is a brief description of each item provided: a. Provided as requested

b. Provided as requested

LVIIL

c. Provided as requested

d. As way farcotte indicated to you on farch 26, data items 40.1 and 40.2 were identified to refine items 17.1 and 17.2. It was decided to map this information from the color  $1^{\circ}$  = 2000° air photos (flown during summer 1981) to provide additional input to the urban/residential analysis of the routes. This information was collected and mapped in August 1981, prior to the September 14-16 route comparison workshop. As to the number of residences along segment 132, I am unable to say whether an actual figure had ever been arrived at prior to this barch.

April 9, 1962

As Jay indicated to you March 26, the residences in the Maxville area were mapped as a computity because they occur more as clusters than as individual residences. After being identified as clusters or communities, communities were not further differentiated on the basis of size or mander of houses.

The specific figure of 14 residences was arrived at on March 25, 1982, in response to item number 21 of your March 22 letter. The study team landscope architect, using the 1981 color airphotos, counted all dwellings in a 1-square sale area centered on the Maxville crossing. As indicated in our Harch 25 response, he counted 14 residences.

e. Provided as requested.

f/g The entries in the Data Item Definitions and Sources were generalized references which did not necessarily list, in detail, all the specific sources used to produce a particular map. Such generalized listings typically occurred for data items which were based in large part on USFS and BLM sources. In such cases, rather than listing each specific resource map used, all references were generalized as "Una.ublished resource maps". During your March 26 meeting with day Marcotte, he offered to try and give you a more specific list of these resource maps for data items that you deemed in ortcut for your review. For the data itens you mentioned in your March 29 letter, no "wore specific" sources were used other than what is shown on the list. However, reference to our 1':2000" color air photos was inadvertently contted from the Lata Item. Sources. These were the nation sources for the land use data base. As Jay indicated to you on March 26, the major sources for Agricultural Productivity (note: this refers to Prime, Unique, or Statewide important lands and nothing else) were the maps or photo-maps available in each SCS District Office. The actual use of land for agricultural purposes was part of the Land Use/Land Cover data base and was congiled using aerial photography along with the sources listed under data item 16.6 on page 10.

- h. We are providing two copies of the project mailing list. The first is the earliest dated list we have record of. It is dated dury 1981 and basically contains the people to whom notices of the Gay 1981 Cooping Heating were sent. The second list is cur current and hard list, dated which 1982.
- i. Provided as requested.
- j. Access roads requirements were estimated by BAA's right-of-May engineering group based on helicopter recommissance, bir photo interpretation, and on the ground field checking. Access requirements were divided into three groups (High, Roderate and Low) as defined in our March 26 response. These were averaged for each segment and entered into the data file. Each team analyst used the data printouta, including the one on access fin performing his route option rankings. In the case of the Socioeconolde study, the analyst multiplied an average mile figure for each access class by the number of miles in that Category to arrive 44 an estimate of the total marker of miles in that Category to arrive 45 an estimate of the total marker of miles in the cases requirements. Therefore, 7.7 X 4 = 30.5 hiles of access required per each line mile once the "high" (Category.
- k. Per telecon April 2, 1982, you have already obtained a copy of this.
- 1. Copies of these maps have been sent to our discould office where you may review them.

Additional concern: The individual residents BPA met with on July 7, 1981 whose names were requested in your March 22 letter have given pennission for their names to be provided to the Granite County Al'iance. They are:

ivelena Anderson Stuart ioujutian Hrs. Albert Pooter Laura Ladietter Cordon Poster Elher Lachennayer Hay Bucier

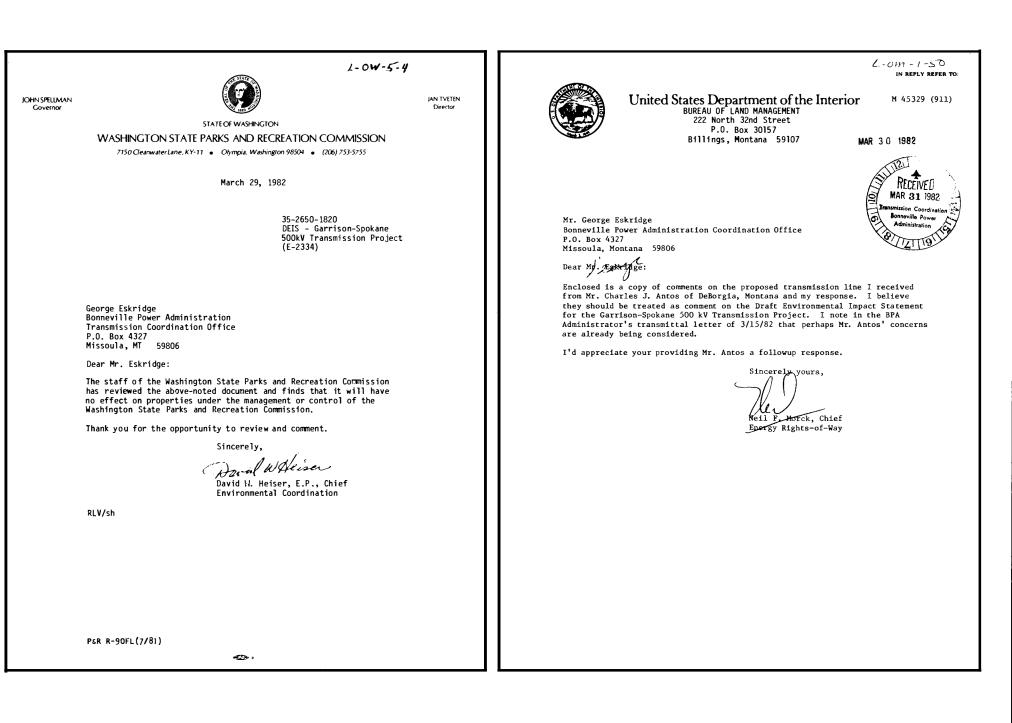
This information supplements that which we provided earlier. I trust that it will enhance your review.

Again, thank you for your interest in this project

Sincerely,

5.6. A state for George Eskridge Projects information Officer

З



L-01m -1-50 IN REPLY REFER TO: March 16, 1982

Dear Mr. Morek,

M 45329 (911)

MAR SU WEL

Mr. Keil Morek Bureau of Land Managefient. (2) 222 North 52nd Street P. O. Box 30157 Billings, Montana 59/07

from Mi. Baucus's representative.

Ge av DATE MOVINE. 01112-0 1.4 ОЛТ ASU E1. K/W EP AGST FT UNION F. RES 0. ALIA ACTION FLING M4532

Time after time I heard of all the studies, studies, studies, basing done to arrive at this supposedly educated answer is a lightning and laying out the route for these monster size to car the investment mission lines.

At the BPA meeting in St. Regis last December, I die

We were getting a real snow job by the two men from

If this is the case it would be impossible for these tax not to know where the Lontana-Idaho state line road would be or the lineral Sanders county line known as the CC divide is. Notther of the three gentelmen knew anything about either area. The only put custer was that "the present route had the least environmental impact". I say "BULL". It does have an impact on those people who have to live here. This is our environment. We will be picking up the tab for these huge towers and lines.

There was mentioned the high cost of roads, Again mobiling specific. A lot of road is already there on the Kontana-Hoho state line. The towers and lines would be hidden, out of the way, and no private property owners ripped off. The sub station could be put in the East-Portal area Mest of Saltere, which also has an adiating access road. No one lives in the area went of Saltere to the top of look-out pass. On federal land

The CC divide route also has several access roads to it. This route would also put the towars and lines back and out of the way. The substation could again be put in the area wort of  $\mathbb{CLM}$  and, on federal land,

This is an area of about 90% federal and 10% private property. Fr. Baucus stated that the 3% was to put the towers and lines on federal land wherever possible. Fine.

WHY ARE OUR BACK YARDS IN HIG CONSTRANCE AS EXVING M.S. LEAST HAVENON-MENTAL HERACT. This does not make any sense to me. Does it to you, with the amount of available federel land in the area?

Thank you for taking the time to read this letter and considering the alternitives.

Sincerely Yours, (Shades, Charles J. Charles J. Charles J. Chatos Hox 26 Rotorgia, Hontana 59:30

Mr. Charles J. Antos P.O. Box 26 DeBorgia, Montana 59830

Dear Mr. Antos:

I have your letter of March 16, 1982, and appreciate your taking the time to express your thoughts on the location of facilities associated with the proposed Bonneville Power Administration (BPA) transmission lines. While I can appreciate your concern it takes the knowledge of a number of people, often representing several agencies and the public, to plan and route a power line and prepare the environmental assessment. Not all of those participating are familiar with all segments.

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

222 North 32nd Street

P.O. Box 30157

Billings, Montana 59107

In reviewing the Draft Environmental Statement and its transmittal memorandum of March 15, 1982, I note BPA's comment on some possible line adjustments to avoid private land and reduction of visibility in the St. Regis area. Perhaps they are already addressing the issues you raise.

I am forwarding your letter to:

Mr. George Eskridge Bonneville Power Administration Coordination Office P.O. Box 4327 Missoula, Montana 59806

Mr. Eskridge will see that your comments are considered and likely will provide you with a response.

Again thank you for your interest in this project and the suggestions you have made.

Sincerely yours,

Neil F. Morck, Chief Energy Rights-of-Way

# L-0M-1-50



Ples comment

Mr. George Eskridge Bonneville Power Administration Transmission Coordination PO Box 4327 Missoula, Montana 59806



Granite County Alliance

March 25, 1981

### Dear George:

The inclusion of a public hearing in the area of the environmentally-preferred Taft route in the Flint Creek Valley seems essential to any notion of effective public input for the environmental review process. We appreciate your scheduling such a hearing after your original hearing schedule omitted this area.

However, we feel Hall is the most appropriate location for the meeting. Maxville is closer to Hall than to Philipsburg. The ranchers affected in the west valley live in the Hall area. Philipsburg is not included in the Garrison-Missoula study area.

We realize that Hall is close to Drummond but we feel that in view of the other considerations this is not an overriding factor. We note that meetings are scheduled at Frenchtown, Missoula, and Lolo even though all three communities are very close together in terms of mileage.

We reiterate our request that the public hearing be re-scheduled for Hall. The Granite County Commissioners support us in this request.

cc: Pat Duffy Evan Barrett Mike Cooney

Very Truly Yours, do Javenner F. Lee Tavenner

assistant chairman Granite County Alliance

ETJ-21

April 9, 1982

F. Lee Tavenner, Assistant Chairman Granite County Alliance Star Route Hall, Montana 59837

Dear Mr. Tavenner:

I am writing in response to your March 25, 1982, letter requesting that the Philipsburg public meeting be rescheduled for Hall.

I have reviewed the meeting locations with BPA management. We feel that Philipsburg is a good choice for the additional meeting in the Maxville area which was requested by Adele Furby during my phone conversation with her on March 19.

This decision is based on the following: 1) Drummond and Hall are very close together and both locations are very close to the same alternative; 2) it is important that all people who potentially may be affected by the facility be given opportunity to comment on it; 3) the driving times from Maxville to Ball and from Maxville to Philipsburg are about the same (roughly 12 minutes); and 4) Philipsburg is the County Seat.

Enclosed is a list of all meeting locations, dates, and times. Note that there is an open house scheduled preceding each meeting. This session will allow all interested people to discuss the project with key staff on an informal basis.

If I can be of further assistance, please do not hesitate to contact our office.

Sincerely, ORIGINAL SIGNED BY GEORGE I DGE

George E. Eskridge Projects Information Officer

Enclosure



# PAT WILLIAMS

CONGRESS OF THE UNITED STATES HOUSE OF REPRESENTATIVES WASHINGTON, D.C. 20515

COMMITTEES: EDUCATION AND LABOR INTERIOR HINGTON, D.C. 20515

WASHINGTON OFFICE

WASHINGTON, D.C. 2051

TELEPHONE (202) 225-321

TOLL-FREE NUMBER

April 2, 1982

Mr. Wes Kvarsten Director, Division of Land Resources P.O. Box 3621 Portland, Oregon 97208

#### Dear Wes:

I am writing about the Draft EIS which was recently published for the BPA Colstrip Transmission Line segment between Garrison and Spokane. I request that this letter be made part of the public EIS record, and I will be submitting further comments throughout the comment period. I am writing today to ensure that clarification on certain points is established <u>prior</u> to the public meetings.

As you know, I wrote BPA on February 1, 1982, and requested that BPA reevaluate the centerline location near the town of Maxville. A public meeting was held to discuss adjustments to that centerline, and BPA has since assured me and concerned citizens in Maxville that alternative routings would be evaluated prior to the public meetings. I am referencing a letter to Clayton Herron of February 5, and a letter to me of February 19, both signed by George Eskridge, Projects Information Officer. I therefore expect that BPA will indeed have evaluated alternative centerline locations to the south of Maxville prior to the public meeting on April 22. As I've stated earlier, the centerline location near Maxville is not fully defensible. I realize BPA's desire to discuss these changes as part of the EIS process, but an alternative must be identified prior to the public meeting for comparison purposes.

The regulations governing NEPA, published by the Council on Environmental Quality, state that "If a Draft statement is so inadequate as to preclude meaningful analysis, the Agency shall prepare and circulate a revised Draft on the appropriate portion (CEQ, Sec. 1502.9a). I submit that an analysis of a southern alternative is warranted, and will satisfy the "revised Draft" portion of the regulations.

THIS STATIONERY PRINTED ON PAPER MADE WITH RECYCLED FIBERS

Wes Kvarsten April 2, 1982 Page two

I understand that BPA officials informed the Granite County Alliance, in a meeting held March 25, 1982, that no comments or letters received before the Draft would be considered. This directly contradicts assurances given to my staff that these comments, including my letters of February 1 and March 8, would indeed be considered in the preparation of the Final EIS. Maxville residents were told at the public meeting of February 4 that their comments could not be addressed in the Draft EIS because it had already been sent to the printer, but that their comments would be considered in the Final EIS. BPA now seems to be of the opinion that comments submitted "too late" for the Draft are also "too early" for the Final. The work of the Granite County Alliance, the many letters and petitions received from folks in Maxville, and the communications BPA has received from the Montana Congressional delegation should be thoroughly analyzed as part of the EIS process. To ignore their existence will seriously endanger the credibility of the EIS itself.

I would appreciate your earliest reply to this letter. I am confident that, if the EIS process is rendered meaningful by Bonneville's compliance with the assurances given to me and other interested persons in the past, a full and informed discussion of alternatives will resolve this controversy.

Best regards.

Pat Williama

THIS STATIONERY PRINTED ON PAPER MADE WITH RECYCLED FIBERS

APR 1 3 1982

Bonorable Pat Williams House of Representatives Washington, DC 20515

Dear Mr. Williams:

EVE

Thank you for your letter of April 2, 1982, regarding Bonneville Power Administration's Garrison-Spokane SCO-KV transmission study and the extent and timing of consideration being given to a routing alternative suggested by citizens of Maxville. Your letter has been included as part of the BIS record, as requested.

We have reviewed the extensive correspondence on the concerns about the Maxville line location, including the March 16, 1982, letter to Adele Furby from George Dakridge which outlines the EIS process which BPA is following. In this process, we have examined an alternative to the Maxville route at two points. First, the 1981 studies that produced the locations identified in the draft EIS did include the area south of Maxville. That area was thoroughly considered when the corridors were laid out, but a line farther south was found to cause higher impact on environmental and engineering factors. Therefore, the line was located just north of the Maxville area. This has been explained to the Granite County Alliance during the past several months.

Second, UPA staff has reviewed and analyzed the suggestions presented over the past several weeks by the Alliance and the evaluations undertaken by the interdisciplinary (ID) takes at the Deerlodge National Porest. To date, all reviews both by BPA and the United States Porest Service (USPS) teams have concluded that the route as proposed appears to be the best from an engineering, environmental, and economic perspective.

When I met with your field representative, Mr. Patrick Duffy, in Missoula on March 9, we discussed the EIS process and the need for reserving decisions on studying more alternatives or route adjustments until the review of material in the draft EIS is complete. The comment period will extend until May 28, 1982; we will then conduct an analysis of comments which will take from 4 to 6 weeks, depending on volume of material and transcripts subjusted. Pollowing this, BPA and other cooperating agencies will assess whether a full comparative analysis of route options or adjustments will be made, or whether a discussion/response is indicated. If an analysis is indicated, BPA would then reconvene the interagency team to look at route alternatives and to study each case, using methods indicated in Appendix A to the 2DS. A coxplete response to the concents will appear in the final EDS, which should be available to the public in fall 1982.

Your second concern involved the tikely inclusion of convents in the EIS process. When we offered to reat with the Alliance late in March, it was to make them fully aware of the EIS process and to suggest how uset to prepare for the upcoming meetings so that their contents could have the greatest impact on the decision on final locations (meeting news enclosed). We did discuss the status of these suggestions used prior to publication of the EIS, noting that much correspondence exists in the official project files of the past 1-2 years. These custents are considered as part of the meeting process. In recommendence he allowed that copies of previous convents slight not be sufficiently recognized, we suggested that copies of previously submitted letters and correspondence be attached to any statement of comments provaided.

Unfortunately, our desire to reassure the Alliance that their pre-EIS comments would be fully considered was taken to mean that we will not consider them at all. this is not the case. All comments rade before the draft was sent to the Government Printing Office (Pebruary 2, 1962) are included as part of scoping. All comments and suggestions made since are included as "comments on the draft." We are currently writing the Alliance to assure them of this fact.

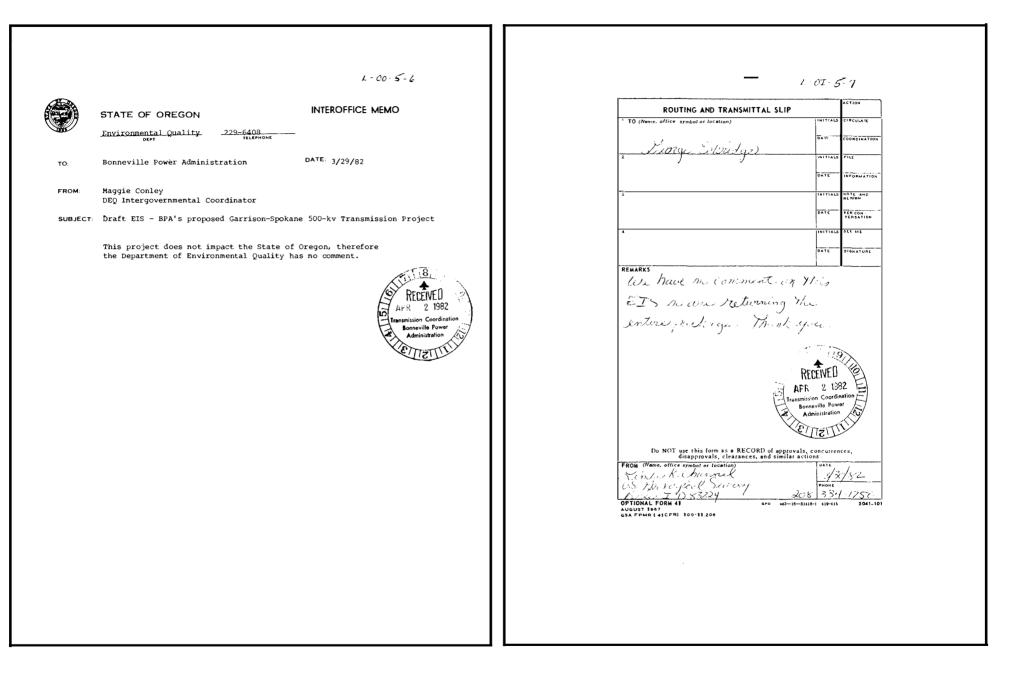
I hope that this letter has answered your questions, and that everyone involved can effectively work within these planning procedures so that all interests and values may be fully considered in this complex land use siting project.

Thank you for your continued interest in our project.

Sincerely

Criginal Signod By WES KVARSTEN

Wesley J. Kvarsten Director, Division of Land Resources 2



# L-mx-3-8

Granite County Alliance March 30, 1982

APR 3 1982 Lassinistion Coordination Annovite Power Administration

## Dear George:

PO Box 4327

Mr. George Eskridge

Bonneville Power Administration

Transmission Coordination

Missoula, Montana 59806

Thank you for your letter of March 16, 1982 regarding your interpretation of the EIS process. We also appreciated your meeting with us Thursday, March 25, in Hall regarding how to comment on the draft EIS. However, we take exception to your continued attempt as evidenced by comments in the letter and the meeting to sidestep and delay the Maxville issue.

In the March 16 letter about the EIS process you say that with regard to routing alternatives suggested while the draft EIS is being prepared that the "responsible Federal agency is directed, by regulation, to consider such changes and to report on all results of such study...during the comment process: that is, during the period of time when the completed draft EIS is made available for public review throughout the study area and the country."<sup>1</sup>In this regard, we request that you confirm that you are studying or plan to study alternative routings in the Maxville area, and that you will "report on all results of such study"<sup>1</sup> prior to closure of the comment period now scheduled for May 28.

We also suggest that considering the clear mandate of the Feb 4 Drummond meeting, which was held six weeks prior to completion of the draft EIS, that studying alternative routings in the Maxville area now and reporting on such study prior to closing of the comment period is in keeping with the basic alternatives-comparison concept of the EIS process. Then comments to both alternatives can be addressed in the final EIS.

Your comments at the March 25 meeting in Hall raised further doubts that you intend to respond to Maxville area concerns. You (George, Tim Murray, and Dan Bisenius) suggested

# L-mx-3-8

that comments received after com letion of the scoping process and prior to publication of the draft EIS, including the Feb 4 meeting in Drummond and our letters, were a "grev area"<sup>2</sup>and somehow "outside the EIS process" While your cover letter accompanying the draft EIS states that these comments would be considered as comments on the draft EIS, at the meeting when you were specifically asked if this was true, you replied that they would probably not be utilized in the same manner as comments received after publication of the EIS. and that to be sure that they are considered, we should make copies of all letters and resubmit them. Since these letters are presumably still available to you in your files, this would be pointless. The crux of whether or not a comment becomes important for you to consider should not depend on its being published in the EIS. Furthermore, to pretend that comments submitted prior to publication of the draft EIS are comments in response to the draft EIS is inaccurate and misleading.

Your insinuation made in the March 25 meeting that the Feb 4 meeting was somehow just between the Granite County Alliance and the Forest Service raises further questions about your understanding of the purpose of the meeting. BPA was not invited to that meeting by mistake. The purpose of the meeting was specifically to inform all agencies involved in the process of siting this line about the concerns of the people in this area. More specifically, we informed you in no certain terms of our objections to the present route location and presented you with a proposed alternative route corridor. This meeting was preceeded and followed by direct correspondence to you to the above effect.

Our interpretation of CEO rules on NEPA does not warrant the contention of your March 16 letter that BPA "can make no decision on further studies until the draft EIS is reveiwed and the extensive studies....have received the opportunity for public comment."<sup>1</sup> Rather, CEQ mandates that agencies "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicte"...early in the NEPA process. In view of the fact that no alternatives to the Maxville crossing were studied, developed, and described previously, we suggest that you do so immediately. Otherwise,

# L-mx-3-8

"if a draft statement is so inadequate as to preclude meaningful analysis, the agency shall prepare and circulate a revised draft of the appropriate portion."<sup>5</sup> If BPA responds to public comment received prior to publication of the draft EIS by studying, developing, and describing appropriate alternatives to the Maxville crossing and making that information available for public comment prior to closure of the public comment period, BPA can preclude the necessity of preparing such a revised draft.

The alternative routings suggested in the Maxville area have never been studied by BPA, at least not to our knowledge. Certainly the draft EIS cannot be considered a study of alternative routings in the Maxville area.

Extending the public comment period to allow responsible study and consideration of an alternative route in the Maxville area would be preferable to conducting a supplemental EIS as had to be done in the Boulder area. However, timely study of our suggested alternative could still be done so that review and comments could happen prior to the proposed May 28 closing of the comment period.

We have pointed out numerous problems and questions arising out of your March 16 letter and your March 25 meeting with us. We request a response answering these many questions and specifically outlining what action you plan to take in response to our continuing and repeated request for study and consideration of alternate routings in the Maxville area.

Thank you.

cc: Evan Barrett Pat Duffy Mike Cooney

Very Truly Yours, F. Lee Tavenner

assistant chairman Granite County Alliance

1. March 16 letter from George Eskridge to Adele Furby

2. Dan Bisenius, March 25 meeting with Granite County Alliance

- 3. Tim Murray, March 25 meeting with Granite County Alliance
- 4. Sec 1501.2(c) of CEQ regulations for NEPA. (p.5)
- 5. Sec 1502.9(a) of CEQ regulations for NEPA. (p. 11)

EVAB

MAR 16 1982

Ns. Adele Furby, Chairperson Granite County Alliance Star Route Hall, Mr 59837

Dear Ha. Furby:

Thank you for your letter of February 4, 1982. It reinforces our understanding of the Granite County Alliance concerns about the proposed Bonneville Power Administration project as it would pass near Marville. We are sorry for the delay of this response; it was caused in part by our ongoing meetings on this subject. IFA, as you are aware, has been dealing with the Marville concerns since summer 1981, when meetings first occurred with Landowners and concerned citizens in the area.

As part of this ongoing reponse to your concerns, we have discussed the altuntion with U.S Forest Service representatives and have attended several meetings with USFS personnel to add our information to their evaluations.

We have also held several discussions within and outside EPA, including discussions with Congressional representatives to explain the EIS process through which the agency will deal with suggested changes in the route alignments already examined in the draft document. This process is discussed below and is more comprehensively covered in the copy of the Plan for Environmental Studies, enclosed for your information.

The process, regulated by the Council on Environmental Quality, provides for full and thorough consideration of all comments and concerns of those within the study area of any given project. Scoping meetings, for instance, must be held throughout the area in the initial stages of study, so that areas meeding attention may be appropriately identified. Such meetings were held in Drummond and Clinton, Hontara, among other towns, in May of 1981. Subsequent studies and evaluations were based, in part, on information received through the meetings and comment letters submitted then. When major changes such as divergent routing alternatives arise later in the process, particularly after the studies and the ranking of all routes have been completed and the EIS itself is well into draft stage, CEQ regulations allow for such input to be considered at a particular stage in the process. The responsible Federal agency is directed, by regulation, to consider such changes and to report on all results of such study. This step takes place during the comment process: that is, during the period of time when the completed draft EIS is made available for public review throughout the study area and the country. Regulations appoint that and astisfactory response must and will be made. I enclose a copy of the "memory response must and will be made. I

2

BFA does fully recognize the seriousness of your interest in the Maxville routings. We also recognize that reviews done by the USFS (Deerlodge) do not fully address the social impacts on private/agricultural land. We ere both bound and committed to reviewing those concerns, but we can make no decision on further studies until the draft EIS is reviewed and the extensive studies already completed over the past two and one-half years have received the opportunity for public comment. The public comment period, to begin this month with the mailing of the EIS, will extend until May 28,1982. EFA will hold meetings throughout the study area to receive comments during the month of April and extending into May. We also expect to receive numerous written comments through our Transmission Coordination Office here in Missoula.

The MEPA (National Environmental Policy Act) process, outlined in our Flam for Environmental Studies, then specifies that we consider and analays all comments made, so that concerns arising therein may be studied and responded to in the final RIS. It is most important that all concerns be heard before commitments or other decisions are made on any single segment or single concern. Only then can final studies be made, adjustments (if warranted) made, and explanations prepared to serve as the final RIS. This stage will begin during the summer; the final RIS is not expected out until fall 1982. The Record of Decision, the formal and final choice, cannot take place until 30 days after the Final RIS is issued.

The NEPA process, which assigns certain actions to certain times, may eeem cumberscae or formal. It is designed, however, to protect the interests of the public and to ensure that all concerns are given their due weight. EFA would be willing to meet with the Alliance to explain the EIS information and to suggest to the Alliance what you might best do to prepare for the Drumsond meeting in April or for written comments on the draft EIS. Dan Bisenius, Team Leader, Tim Murray, and I could most emaily coordinate our soldwalkes to meet mark week, if that suits you.

If such a meeting would be helpful, please give me a call at the Missoula office (1-800-332-2421). Thank you for your patience in musiting our reply. I look forward to meeting with you again.

Sincerely,

S George E. Eskridge, Project Coordinator Missoula Coordination Office

#### 2 Enclosures

oo: Barl Reinsel - USFS Charley Miller - USFS

Hr. Mike Cooney Honorable Max Baugus' Office

Mr. Pat Duffy Honorable Pat Williams' Office

Mr. Evan Burrett Ecnorable John Melcher's Office

# 3

## April 2, 1982

Mike Cooney Senator Max Baucus Room 256, Federal Building Butte, Mt. 59701

Dear Mike.

Thank you for your letter of March 31 which accompanied a copy of a letter Max received from George Eskridge, dated March 29. This letter contains many statements which I consider to be either innaccurate, misleading, or downright untrue. Therefore, in order to set the record straight, I will list below the errors  $_{3}$  B I see them.

Paragraph 3: I did not request an answer from George on behalf of the Forest Service. I requested that he state what BPA's opinion was regarding the suggested new criteria which were described in the Alliance letter to the Forest Service.

Paragraph five: This is the first notification or knowledge we have ever had regarding a steering committee meeting on March ninth.

Paragraph 6: After inquiring about possible conversations with BPA personnel with yourself, Evan Berrett, and Pat Duffy, I am cohvinced that the primary thrust of these conversations on March 9, 10, and March 15 with the congressional aides was not to inform the aides of the steering committee decision that BPA should not make any commitment to a full ID team evaluation of the Maxville Bituation until the public comment period was over. Rather, all aides stated that the primary concern expressed by BPA was to make sure that all of the comments and responses were "within the KIS process".

Paragraph 9: During the September 9 meeting with Lee, the main question regarding "the possibility of moving the line" was not so vegue and general. Specifically, since we had indicated our intention to build both our home and barn very near the northern boundary of our property, and since at that time BPA maps indicated that the line would go 1 mile north of that line, Lee asked what the chances were that the line would be moved to the south, thus coming even closer to our homesite. Paragraph 10: The September phone call mentioned was when George called to assure Lee that the line would not be moved to the south, and that any changes that would be made in the line would be in the northerly direction. This turned out, in retrospect, to be untrue, as the next map we saw, and the most recent BPA map we have had a chance to see, indicates that the line has already been moved between one-eighth of a mile and one-quarter of a mile south, now coming only a few hundred yards from our homesite. At that location BPA indicates the intention to install a tower.

Faragraph 15: The Granite County Alliance did not ask the USFS to evaluate a route approximately midway between Maxville and Philipsburg. This is a complete falsehood.

Enclosed please also find a March 30 letter written to George Eskridge bý Lee on behalf of the Alliance. It outlines the major points of disagreement that we have with Bonneville regarding their interpretation of the EIS process. We are hoping that Max will concur with our interpretation and will be able to encourage BPA to utilize the EIS process properly.

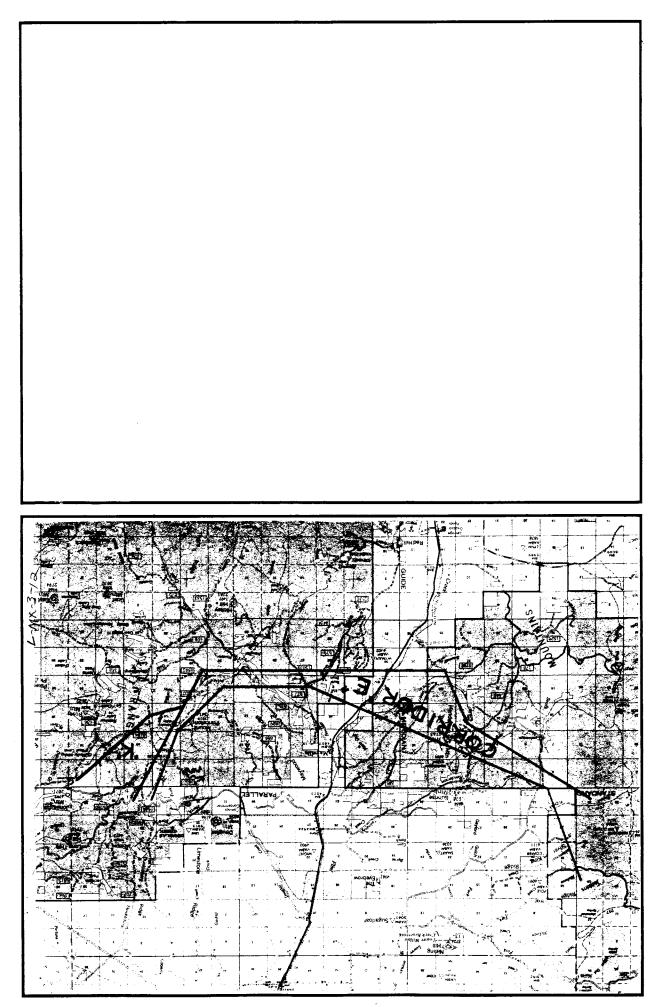
Again, thanks for your help.

Sincerely,

adele July Adele Furby, chairman

Adele Furby, chairman Granite County(Alliance

cc: George Bskridge Pat Duffy Evan Barrett L-MX-3-12



April 9, 1982

F. Lee Tavenner, Assistant Chairman Granite County Alliance Star Route Hall, Montana 59837

Dear Mr. Tavenner:

Thank you for your letter of March 30 about the Maxville routing and the actions we plan to take in response to your concerns. I am sorry that we have not explained ourselves clearly enough, and trust that this letter will clear up any misunderstanding.

Here is what we will do: Between now and May 28, we will gather every comment we can on the EIS, through letters and public meetings. This includes all comments on any auggested route alternatives in your area. This also includes information and comments made since February 2, 1982, for reasons explained below.

Then we will sort and categorize comments for response. All comments and responses will appear in the Final EIS. Such responses can include any and all of those listed in the CEQ Regulations.

The alternatives you propose in the Naxville area which have received study and review by the Forest Service as well as BPA will not be studied further at this time. BPA will reserve the decision on studying more alternatives or route adjustments until the review of the draft EIS is completed and information reviewed. This will probably take four to six weeks after the comment period is over. After this BPA along with cooperating agencies will decide if the interagency team will further study those suggestions using methods discussed in Appendix A to the EIS. Results of any further evaluation will appear in the Final EIS.

The Final EIS is also open for comment. No final decision can be made on routing until 30 days after the Final EIS is published.

Our course of action is determined by several factors. All comments and suggestions made during scoping are taken into account before and during the analysis and writing, even up through interdisciplinary team meetings to evaluate and rank segments, routes, and plans. These meetings took place last fall, and ended with the final plan ranking meetings on November 3. Extensive review and rewriting of the document enabled us to prepare the "camera-ready" copy of the draft EIS by the end of January. It was sent to the Government Printing Office in Seattle on February 2, 1982. At this point, no further changes--beyond minor typographical errors--could be made. Scoping was closed.

For this reason, your comments and suggestions will be considered in our next opportunity for response on the record, which is our response to comments on the draft. In this way, every comment can be considered. Although we could not reassemble the interdisciplinary team, evaluate, compare, and rank those variations suggested this late in the process, we did clearly notify the public of those suggestions in the "Dear Reviewer" letter and map which accompanied every volume of the EIS.

You can resubmit the proposal or comments made between February 2 and March 16, when copies of the EIS were mailed to the public. They will be taken into account in the comment review process. You are velcome to submit additional comments directly on the draft EIS.

It was our understanding from the March 25 meeting that you might want to resubmit copies of past correspondence that you specifically wanted to be treated as EIS comments. Obviously, this certainly is not a requirement but as was discussed could be done to assure you that certain items from the extensive project files will be addressed in the EIS. Obviously, not all letters and correspondence received during the past 1-2 years will be treated as EIS comments.

I am sorry for any misunderstanding in our recent meetings and letters. I trust that this letter has spoken plainly to you and answered your questions and concerns.

Sincerely,

ORIGINAL SIGNED BY GEORGE E ESKRIDGE

George E. Eskridge Projects Information Officer L-SK-5-



United States Department of the Interior

BUREAU OF MINES WESTERN FIELD OPERATIONS CENTER EAST 360 3RD AVENUE SPOKANE, WASHINGTON 99202

April 2, 1982

Mr. George Eskridge Bonneville Power Administration Transmission Coordination Office P.O. Box 4327 Missoula, Montana 59806

Re: Garrison-Spokane 500-kV Transmission Project

Dear Mr. Eskridge:

The review of the Garrison-Spokane 500-kV Transmission Project revealed the following potential problems that were unaddressed in the text.

Will this project affect the potential development of any underground mining properties or have an impact on any current mining operations? If the properties themselves are not affected, is it possible that access to them will be? Will any towers be constructed on gold placer deposits, sand and gravel deposits, or any other deposits mineable by open-pit techniques?

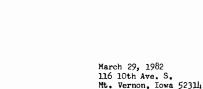
Careful route selection through mineralized areas could alleviate potential conflicts with the mineral industry.

Thank you for the opportunity to review your Draft Environmental Impact Statement (DEIS).

Sincerely,

Ellor C Matter

For Robert D. Weldin, Acting Chief



Mr. George Eskridge Bonneville Power Administration 1620 Regent P.O Box 1327 Missoula, Montana 59806

Dear Mr. Eskridge:

I earlier (Feb. 21, 1982) wrote to Mr. Wilkerson regarding the proposed Garrison-Spokane Transmission Project and he suggested that I contact you. I own 40 acres in the Sleeman Creek watershed the northern portion of which is to be crossed by the new transmission line under the Taft alternative.

L-EW-1-63

First, I doubt whether a new transmission facility is required for the area. The Northwest is a well known energy surplus area and I see no persuasive reason why the transmission line must be bullt now. I am aware of the arguments against a No Action alternative (pp. 3-4 and 9 of EIS Summary Report) but I find it easy to disregard an analysis by the same agency that benefits from the project.

Second, it is clear that the intent is to seek an easement on the property should the Taft alternative be selected (which seems now to be the case). It is true that the line would run only through the northern part of the property but then its value to me or any subsequent purchaser would be drastically reduced. The property was purchased as recreational land and any near future potential is for that function alone since there exists little marketable timber. Thus the line might as well run through the middle of the property. Who could appreciate the promerty for recreation when a 175' tower looms over the landscape? It would seem proper under the circumstances that the entire h0 acres should be purchased at market value if indeed the Taft line is the one selected.

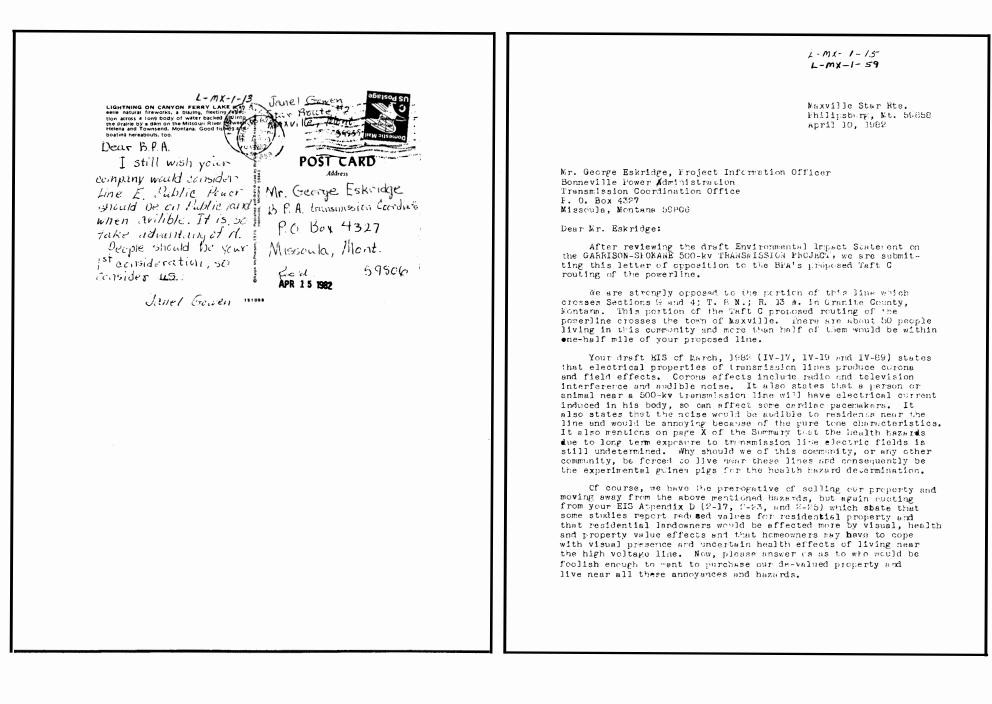
Sincerely, Link to burg-

16-IV too high thational delipt, scheuled mugh where of the economy and the aluarly a need for the line at all, also the at parsing for duy Rumanie mittakes, Alter restain all the muse wopss and public in general an spetting time Dear George Euteridge in little Second She Chains, shere in he hegels considered, if there is payers paying for their michiakow which we had use note in , The least meander prime plante alecun dentit Alle BPA. and Caropo, with note questioned, and the surphy and lost of cost and must energy afficient nexts Administration BPA. Annan- Starbane Sci KV with the need for mon every. here after nearly the EIS's attendence The rate spargers , purpiter sources -Ihand you for the BPA'S EIS APR 6 1982 (Japi & 2, 1982 L-SR-1-9 Lauri F. Palmeri PO 30× 18 St. Resis, Mant new mon painted right of way needed (224) he the most scononical for rate payor least ancient of new non - pavalled right alternative #- Horspung Plan is Lester ally purfused by BDA Only it is indicted as of my south ( July miles ( July an in the Jourest transmession June energy loose, and ad towned to at ( 185 million) it also have the cut timber and inviorment movie be miles, the distruction of miles of clear energy loos of the three choices and most and how the highest transmission line there veren in the title east (& 159 minus) and B. PA. demestating and unnicessary alternatice C - Hagt Plan, is environment. Survey L-SR-1-9

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| DENVER, COLORADO 10223  |                     | April 8, 1982   |
| April 2, 1982 • | HEP-08              | <text><text><text><text><text><text><text><text><text></text></text></text></text></text></text></text></text></text> |



L~MX-1.15 L-MX-1-59

Mr. George Eskridge

A: 111 10, 1982

We also find a pross error in your ETS Appendix A in Attachment 1. This states that on July 7, 1981 the BrA met with residents of the Nexville area to discuss a transmission live routing through this area. We have talked with every resident of Maxville reparding the above statement and not one of the residents of Maxville ever beard of such a public meeting nor was any one of them contacted to discuss such a routing. When asked by one of the Granite Consty Alliance members to five some of the names of the people who participated in this meeting, you stated that you could not divulge this information. However, in this same Appendix A on July 9th and again on July 15th the BrA met with Ledbetter ratchowners and their names were divulged. What makes the surpresed meeting of July 7th different from the Meetings of July 9th and 15th. We also feel that the town of Maxville was ignored completely in your planning because we have been unable to find it mentioned on any of your ELS maps.

-1 -

New getting to the economic impacts of this proposed laft C line. We, as well as several other individuals, have mining property in Sections 9 and 4; T. 8 N.; E. 13 W. which will be greatly affected by this poverline route. You were kind enough to send us information on mining and blasting near a 500-kw transmission line in which it stated that the BFA Fust be notified 15 days before blastler, among other things. Can you tell me how this would be possible when an actively producing mine is blasting almost every day.

The sum total of this letter is that we are definitely opposed to Taft C alternate route as it is now proposed and wish to go on record in your final Draft Environmental Impact Statement as such.

We understand that the Granite County Alliance has proposed a more southerly route for that portion of the laft C line which crosses the Maxville area. This alternate route would principally be on public land, is referred to as Corridor E by the Allience, and is located approximately 3 miles south of the townsite of Maxville, Montana. We strongly urge you up consider this alternate route through Corridor E.

Very troly yours. James & Marke Grace & Mache Jones E. Noohl

Grace C. Nachl

L MS-1-112

April 14, 1982

Box 3101 Missoula, MT 59806

Mr. George E. Eskridge Bonneville Power Administration Transmission Coordination P.O. Box 4327 Missoula, Mr 59806

Dear Mr. Eskridge:

I am opposed to the "environmentally preferred" or Taft route proposed for the Garrison-Spokane 500-kilovolt transmission Project. Not only has the demand for electricity decreased; but also the route would negatively affect both humans and wildlife. The proposed route would alter cultural resources, remove vegetation, increase erosion, and change wildlife habitat -- both golden and bald eagles nest along the Bitterroot River. The powerline would visually scar the Missoula area and future health hazards are possible. Do consider an alternative route and do discourage the Taft route!

Sincerely,

Rhia Crown

Rhea Cronin Box 3101 Missoula, MT 59806

cc: Missoulian Honorable Max Baucus Honorable John Melcher Honorable Ron Marlenee Honorable Pat William

L-MX-1-17

Jale Martin Maxville Star Route Philipsburg, Montana 59858

Apr 1 4, 1982

Mr. George Eskridge Bonneville Power Administration Transmission Coordination P.O. Box 4327 Missoula, Montana 59806

Mr. Eskrige:

**MI-96** 

In a democratic society such as ours I simply cannot understand or approve of the Bonneville Power Administration's latest actions.

Neither Maxville or the Granite County Alliances proposed southern route was evan mentioned in your draft Invironmental Impact Statement. As far as I am concerned you are trying to Stonewall us.

You continue to ignore us until, you hope, your route is approved. Then and only then will there probably be any mention of Maxville. Mister, that stinks!!!!

The granite County Alliances proposed southern route was not evan considered as far as I can tell. Your Public Relations style appeare to function on the basis of saying, give us your ideas and we will consider them. but, in reality, the only ideas you consider are your own. That was a cheap trick putting the draft Invironmental Impact Statement, using maps that listed Maywood Ridge, Stone, and several other small places but <u>failed</u> to include Maxville. Probably because you didn't want anybody who wasn't familiar with the area to know that your proposed route goes right through a <u>town</u>. A very cheap trick indeed.

Since you like this line so much, it's too bad it wasn't routed over your house instead of being pushed off on everyone elses.

Dale Martin

cc: George Eskridge Max Baucus John Melcher Pat Williams

L-MX-1-18

Randy Martin Maxville Star Route Philipsburg, Montana 59858

April 2,1982

Mr. George Eskridge Bonneville Power Administration Transmission Coordinator P.U. Box 4327 Missoula, Montana 59806

Mr. Eskridge:

Having been a resident of Maxville, Montana all my life, I can assure you that the place does exist! I fail to understand how you could have so blatantly overlooked that fact in your draft Environmental Impact Statement.

Nowhere, that I could find was Maxville evan mentioned. We have held meetings, ( We being the "Granite County Alliance.") as you should well know, and a multitude of letters have been written, still, we have received no recognition what-so-ever in your draft EIS. Why?

The southern route that the Granite County Alliance, of which I am a member, proposed; I feel, was not properly considered, if it was indeed considered at all.

I cannot evan think of supporting the so-called Taft-Route. Too many people are affected. I doubt very seriously that the BPA could have picked a route that would hit more residents of Kaxville if they had aimed. Which to me raises an interesting question, Jid they aim for Maxville? Is that why maps were used that didn't include our little town? Is that why we are apparently being ignored? Is the Town of Haxville the <u>only</u> place that has suitable terrain in which to construct your lines? Perhaps you <u>prefer</u> disrupting, an entire town as opposed to disturbing a few tourists. If the reason the southern route is not

being taken seriously is because of monetary reasons, think about this: The residents that this line goes near are going to have to live with it for as long as it stands. I'm sure that taking a little more time and money, the BPA could put the line anyplace they took a mind to. I see no reason why your vast resources must be used to severely disrupt an entire community. No matter what the cost is to construct the line, you will get your investment back in a reletively short time considering the price of power now, and what it will cost in the future.

Think about it.

cc: George Eskridge Max Baucus John Melcher Pat Williams

andy Randy Martin

L-SR-1-40 L-SR-1-14 L-SR-1-14 L-SR-1-40 OFFICIAL FILE COPY - 2 -APR 1 6 1982 Reterred to: We enjoy nature as it is and do not, under any April 8, 1982 circumstances, desire intrusion and or destruction lazen by anyone for any reason. We live here by choice ANS. EI NO REPLY without outside power sources and jointly inform Date M r. Peter Johnson BPA and any other organization so inclined to Ponneville Power Administration have their presence felt, that we don't want 1002 NE. Ho'laday Street your owerlines near us! Fortland, Un 7231 Jem & Conna Courd Ti Box 33.7 St Reger, MT. 5984 Mr. Johnson: William Dake (Jundamer Tomorad Che) William Dake (Jundamer Tomorad Che) Villiam (Junda Pictor 23 M. Regis Villiand Che) This letter is to inform the Di'n and any other organizations that we, the landowners and residents along the proposed "Tamarack Creek route" (including Seven-Mile and the nearby awesomely beautiful land areas near the Clark Fork R iver), have no desire to be in c ntact with your or any other organizations' powerlines. Ulam D'Errow Ro Por 213 ST Ray , Mit 51866 "I Dilliam & Junka Ewann BO. Ber 440 Maurie Clean & Porgers St. Regis, Mentan Our reasons for choosing to live where we do are to be able to be self-sufficient, nonburdening to any other person or persons involved with so-called commercial social improvement, governmental agency or unnecessary forms of mechanically created power; we don't need it. Julie Jahuska St. Regismet. The majority of us have taken great effort to situate ourselves in a position of increased productivity using as little energy as gossible and are completely comfortable doing so! There is no logical reason to destroy new land and impose your ugly dead metal towers, and -Melensa Unker distracting noisy cables on us or the wildlife miana has the back of back, it selde whose home the land also is. We have all read your brochure, that electric Will Ross Kellent B. (Hyde Starkt, Bry 479 - IV. Rogis, Maut Jim Auken James Dowd Jr. Po. Box 33) St Regis MT. 5994 Barbara Fox: St Regio, mt power users have certainly financed, and we all agree that it is both financially and structurally more feasible to run new lines on existing routes without tampering with other land, trees, animal life and Datural beauty, that we the landowners and residents have worked to maintain in its natural state. Walt Smith B.O. Box 31 St Poris John Evons - PO Dox 293 Mark St. Regis, mont. Unni Jermign Si Regis (Occer)

Jim and Donna Dowd P.O. Box 337 St. Regis, MT 59866

Carol - Bitty & Rick Johnson Landowner St Regis L-0I-1-66 THE PLOT NET CONFIGURATION ammut. D. F. ZAREL CLU REPRESENTATIVE John A. Jemm Box 540 St. Regis Jam Allem Box 540 ST. Regis Richard P. Keichert Box 540 St. Regis PHOENIX MUTUAL April 16, 1982 Lifetrisulation Company George Eskridge, Project Information Officer PHOENIX EQUILY BPA Transmission Coordination Office Plaining Corporation P. O. Box 4327 Missoula, Montana 59806 P. 0. BOX 884 Dear Sir: OSBURN, IDAHO U3849 I attended the Open House meeting held in Wallace, Idaho on April 14, 1982. From the information I obtained at this meeting it would appear that the alternate line route with a substation at Eagle Creek, would either pass over a 32 acre tract on which my wife and I have our summer home or very near it. This line would have a devastating impact on the value of our property. It would have a ruinous effect on the aesthetic values, make radio and TV receiption poor or impossible and very probably reduce greatly the number of wild animals, deer and elk mostly, that presently inhabit the area, I expressed my fears to several of your people and was advised to write you regarding my feelings. From a different viewpoint, it would appear to me that the line should be routed where it would have the least environmental impact and where access for both construction and maintenance would be cheapest, that would apparently be one of the route near Lookout Pass and along the South Fork of the Copies to: President Ronald Reagan Coeur d'Alene Miver. Governor Ted Schwinden, Montana Senator John Melcher Sincerely, D. F. Zabel, CLU Senator Max Baucus Representative Pat Williams George Eskridge, BPA Jack Fisher, Forest Service, Missoula, Mt

BFA authority = 1828 Romald and my name is David Marlay and Down a good range fund East of the Bitles Root River has been cut North To South by power liner and one gas line a distance Babout 13/ mi. The open space is busdened with those Montana Pavar installations now, should alternute line South Now, should alternuite line South & Miller Creek be built, it affeass that ner rauch will be once more aut by BPA lines East to list over our protthers most friess of fand in North Fork Davis Coccel Daw religbly informed that BPA has already downenced con-toon nation & preliminary construction work from Harrison West decision is made that the decision is made that the or protects are uselies David Macking

# JOHN MELCHER

Submitted at public meeting, Missoula, Montana 4/19/82

## Uniled States Senate

April 19, 1982

R. Max Peterson Chief Forest Service U. S. Department of Agriculture Washington, D. C. 20013

Dear Max:

For the past two years I have appreciated the cooperation of Forest Service personnel in Region I concarning a proposed right-of-way for a high-voltage transmission line proposed to be constructed by the Bonneville Power Administration. I have urged that the proposed route of the transmission line avoid private land as much as possible, particularly crop-producing land, and avoid coming within a mile or more of any residences. This has meant that most of the proposed routing be on national forest lands.

A draft Environmental Impact Statement prepared by the Bonneville Power Administration of a proposed routing for the line from Garrison west to the Montana border is not satisfactory. Hearings are being conducted in verious communities of western Montana now. One of these hearings was held at Saint Regis last week, where vigorous complaints were lodged by local citizens. A similar public meeting will be held this evening in Missoula. I must most earnestly request that with patience and diligent affort the Region I Sorest personnel continue to work with myself, my staff, the rest of the Montana congressional delegation and the citizens of Montana to observe the following points before any right-of-way by the Forest Service is contemplated:

(1) The right-of-way, if granted, must be satisfactory to Montana citizens or it must not be granted at all;

(2) The right-of-way must avoid residences and must not adversely impact visually or esthetically on Forest Service land or on privately-owned land;

(3) The right-of-way must not impact on cropproducing land unless specifically agreed to by the owner;

(4) The grants for right-of-way must require burial of the transmission line in areas where adverse esthetic and visual impacts must be mitigated by this means;

253 RUSSELL BUILDING

WARHINGTON, D.C. 20510

(202) 221-2512

R. Max Peterson April 19, 1982 Page 2

(5) All alternative routings necessary to accomplish the above goals, including the underground burial of the transmission lines, must be examined to reach a satisfactory Environmental Impact Statement.

(6) Alternatives of not constructing the line from Garrison west but using the power generated from Colstrip 4 in other existing grid systems must be considered prior to completion of a final Environmental Impact Statement.

All of the above points are important in the consideration of complying with the requirements of both the Federal Land Policy and Management Act and the National Forest Management Act, both enacted in 1976. As you recall, I was the author of both acts and feel very deeply that, both in the planning processes for the national forests involved and in the authority granted to the Forest Service for determining rights-of-way for transmission lines, the requirements of these acts must be stringently enforced by the Forest Service. I am pleased that up to this point the Forest Service personnel in Region I have accepted this responsibility, and I am confident that that type of responsible cooperation will continue.

Kindest personal regards.

Sincerely,

John Melcher

April 19, 1982 DRAFT EIS HEARING Submitted at public meeting, Missoula, Montana, 4/19/82

Raymond O. Jensen 9155 Miller Crk. Road (new address: 1200-1700 ft. North of the Lame Duck Line)

As the testimony of others shows, the only responsible action to take is the NO ACTION ALTERNATIVE.

Need was addressed almost 10 yrs. ago, in the Colstrip EIS, issued in 1975. Now the situation is vastly changed and forecasts for the future reflect that fact. It's become obvious that power consumers reduce their consumption as price increases, and the huge price increases scheduled to take effect this summer will force additional ratepayers to unplug their dependency on BPA. Therefore it's obvious that a prudent society would find a way to RE-ADDRESS THE NEED QUESTION.

The <u>single</u> question of need, taken with the cost factor, ought to be reason enough to cause BPA to reconsider and go back to Square One.

Of course, we've all heard BPA's answer to this: Need has been addressed in the Colstrip EIS and we are committed to continue building this Lame Duck Line, they say. It's not hard to see the mentality that created the WPPSS fiasco still at work.

Keep in mind that NO ACTION is the prudent alternative---while I address some of the specifics of the routing in the Miller Creek area.

We've been told that the reason for the placement in the Rodeo Ranchettes/K.O. Ranch area is out of consideration for Lolo residents. 1 drove to Lolo, looked at the route and saw that the route places the powerline in direct view of Lolo! What surprised me more was seeing  $\frac{1}{M^{M+d}} \frac{1}{d} \frac{1$ 

Since there is room for adjustment and this small adjustment is better for all residents concerned, and whereas BPA is so concerned about impacts on people, and whereas we're assured repeatedly that our PAGE 2

comments count, we expect no objection whatsoever to this small adjustment.

Now, as soon as it exits the mouth of the canyon, many thousands of people will suffer visual impacts (11,000 a day traffic count on hwy. near Lolo, plus everyone in Rodeo Ranchettes and Miller Creek Valley-320 families. Total=<u>11,320</u> +. We feel very strongly that burial of the line from that point of visibility in Cahoot Canyon through Dead Man Gulch would be imperative, <u>IF</u> THIS LINE WERE BUILT, <u>IF</u> IT WERE BUILT THROUGH MISSOULA EVEN THOUGH THERE IS NO REASON TO BRING IT WITHIN REACH OF MISSOULA, AND <u>IF</u>, AS A FINAL ABSURDITY, THE TAFT ROUTE WERE CHOSEN.

Why is a corridor being planned thro a major subdivision, anyway?

In Missoula in March, Paul Brodeur (author of Expendable Americans & Zapping of America) discussed the adverse effects of electromagnetic radiation of the low-frequency, non-ionizing type on human health and related the results of various rather worrisome studies by reputable scientists and scientific bodies:

Increased incidence of depression and suicide (Eng.)

- " cancer in children
  - " neurological, cardio-vascular effects, and blood changes (Russ.)
- " " elevated triglycerides level
- " " decreased simple arithmetic ability

eflux of calcium from brain tissue

These were some of the effects he discussed.. There need to be correlative studies done.

During the question and answer session following, the author was asked (I asked) about the distance factor involved in these studies. He responded 1000 ft.

At 1700 ft., what can one expect---less depression? ---fewer cancers? The answers haven't been researched; troublesome questions have been raised by good minds.

## PAGE 3

If Lou Dreissen is here, will he tell me exactly how close the line would be to my house? Can he clear this up---he was quoted as saying in Mar. 17 edition of Mslian, p. 5, that the nearest residence is 2000 ft. We measure on the map 1700 ft. to our house and there are closer ones.

THE COST OF UNDERGROUNDING IS INSIGNIFICANT---no matter what you tell us---33¢ per yr. per ratepayer for 20 or 30 years is not reason to deny undergrounding. If the line is built, it might as well be undergrounded where people are impacted.

THE ADVANTAGES OF UNDERGROUNDING IN THE MILLER CREEK AREA:

Mitigation of visual impacts on 11,320 plus people.

- " radio-TV interference. " shock hazards.
- " shock hazards.
- " electromagnetic radiation's adverse biological effects.
- "Wildlife impacts (Bald eagles, deer, elk).
- " offsite property devaluation. Dames & Moore cites property devaluation as an effect of underground lines; overhead lines should affect prop. values, shouldn't they?
- " all other effects.

в

Also, the best time to develop the technology for undergrounding reliability is while building a line that isn't needed!

PAGE 4

EAGLES

Another of the reasons I don't like such high lines in Miller Creek of oc crossing the Bitterroot River is the bald eagle population in the area.

Each summer I have enjoyed the soaring flight of bald eagles and 2-3 chicks as they came off the nest and learned to hunt. They seem to follow the hills along the creek and river. The powerlines would be at the height they tend to soar. I understand that they tend to run into powerlines and kill themselves.

Quote from Montana Magazine: "such as the duck kills from the 230-kV line from Colstrip that crosses Lake Broadview. Jon Malcolm. of the U.S. Fish and Wildlife Service. estimates that nearly 8,000 ducks die every year from flying into the line or from related causes. such as botulism brought about by the dacaying duck corpses in the lake."---from Line on Fire. by David Lambert, of the Dept. of Natural Resources and Conservation.

Finally, I wish to tie all of this background together by responding to specific points made in the EIS Vol. IV. pp. 54-63.

#### Page 5

#### GARRISON - TAFT SECTION E.I.S DRAFT IV- 54 to 63

LAND USE In Miller Creek (Sections 138 & 139) the route passes within 3 mile of a small residential development (of only 85 homes) plus approximately 6 more across the valley floor in Section 139. The line also crosses thru the middle of a planned 220 unit sub-division that is already approved. Anyone traveling to or from town has to see several towers and the line. Mitigation for this is to underground the line for approximately 5 miles starting in the floor of Cahoot Canyon out of sight and travel across the ridge to a spot across the Bilterroot River and Hiway 93.

### Forestry:

The removal of 140 miles of forestland trees has to effect the rate of snowmelt during the spring season in this area. The too rapid run-off will cause flooding and a depletion of summer moisture.

#### Agriculture:

No ag-land should be removed from productionanywhere. In Missoula County ag-land is dissappearing at too fast a rate already, and there is too little of it left now.

#### NATURAL RESOURCES.

## Wildlife:

Sections 138 & 139 are both a nesting and hunting area for at least one pair of Endangered Bald Eagles and 2 pair of Golden Eagles . The Bitterroot River is a resting stop-over for Ducks and Geese. Mitigation is again to underground the line for at least 5 miles in <del>Scetion</del> 139 and hope that collisions don't occure in the other areas. No action would be a sure cure.

## AESTHETICS

The first miles of Segment 139 would be visible from Lolo and South West Missoula and by local residents. Visibility will be extremely high by anyone entering or leaving the

Miller Creek Residential area. Three miles of towers will be seen going uphill West of the Bitterrpot River.

BPA's orange marker high on the hill North of Cahoot Canyon can be seen from South West Missoula and Lolo and beyond. If a tower is placed there it will definetly be skylighted for ' miles around. Mitigation again is to underground the line from deep within Cahoot Canyon to a point across the Bitterroot River and Hiway 93.

#### SOCIAL CONSIDERATION

Segments 138 & 139 have high allienation in regards to the proposed route even though the EIS doesn't recognize it.

I am asking you to strongly consider undergrounding the line through the lower Miller Creek area over the top of the hill south of Miller Creek and not through the valley floor. Undergrounding should start far enough back in Cahoot Canyon so that it will be out of sight, then proceed to a point across the river and Hiway 93.



Box 9272 Missoula, MT 59807 April 19, 1982

Submitted at public meeting Missoula, Montana, 4/19/82

George Eskridge Bonniville Power Administration Transmission Coordination Office P. O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

Re: Garrison-Spokane 500-kV Transmission Project

These are my comments on the proposed powerlines through Western Montana. I am a professional soil scientist with over five years of laboratory and field experience with local soils. I have also participated in vegetation studies, both in the grasslands and forests of Western Montana. Some of my comments are technical concerning soils and some are personal. I do not represent any group or organization.

As a soil scientist with experience in each of the five counties along these routes, I am concerned with several types of impacts associated with these lines.

Soil erosion is the first of these concerns. Revegetation of disturbed soil surfaces is often a slow, difficult process on the grassland and drier forested lands of Western Montana. Long-term erosion will be significantly accelerated along much of the route. If past experience is any indication, roads designed for powerline access will not adequately revegetate during the life of the line and will be a continuous erosion problem. Powerline roads commonly develop deep ruts and gulleys which are permanent scars upon the landscape. The statement in the EIS that "these impacts are generally minor and short-term" is in my opinion, over-optimistic. The erosion susceptibility maps published in the EIS si\*mply do not reflect the actual potential for erosion along the route. Most of the areas identified as having "low" erosion susceptibilities are rated as having high erosion hazards by other Federal agencies such as the Soil Conservation Service.

Mass movements, including slumps and earthflows, are another concern. This problem is specific to certain geologic materials and the distribution of these materials  $\Lambda e \mathcal{C} d 5$ 

to be considered in powerline locations. Powerlines and road construction can stimulate mass movements, especially where runoff is concentrated on sensitive materials. The draft EIS identifies certain materials which are susceptible to mass movements, but the maps of their distribution bear little or no resemblance to their actual distribution in Western Montana. Areas documented in the existing geologic literature as being very susceptible to movement are labeled as having "low" potential in the EIS. In other cases, some of our most stable local landscapes are labeled as having "high" potentials.

Submitted at public meeting, Missoula, Montana 4/19/82 PATRICK J. LAWLER

A third area of concern is what I will call "weed highways." Disturbed sites along powerline rights-of-ways are commonly invaded by noxious weeds which spread along the route. These weeds use the disturbed rightof-way to enter cropland, rangeland and forests. Costs of weed control programs are thereby increased and generally result in increased herbicide use along the route.

Aside from these professional/technical comments, I would like to express several personal observations.

I am still unconvinced of the need for these lines and would like to see an independent study of need by someone other than power company or BPA officials.

I am distressed that other options, such as shipping coal by train, continue to be eliminated from consideration. Shipping coal would provide longterm employment for larger numbers of Montanans. Pollution sources could also be removed to the areas receiving the benefits of the power and might be located in less sensitive environments. At these meetings we will probably see landowners trying to push the lines off on each other. It is still not too late to stop and admit we made a mistake in planning these lines and reconsider other options.

My biggest concern in this whole issue is for the continuing beauty of our Western Montana landscapes. Powerlines are ugly. As a skier, mountain climber, fisherman, and general outdoor enthusiast, I am physically sickened by the thought of more powerlines.

This brings me to a major point in this whole discussion. I don't think this issue stops at Colstrip 3 and 4, or one pair of 500 KV powerlines. This is just the beginning which potentially leads to Colstrip 25 and 50 with dozens of powerlines. Coal-fires generation plants are notorious for their pollution which can contribute to acid rain. Siting these plants upwind from the breadbasket of America should be highly questioned and closely monitored. Stringing transmission lines across Western Montana will destroy the values most of us live here for. I, for one, would like to know what is planned for the future and where does it stop. In approving these lines we set a very dangerous precedent.

Now, I am not an economist or an engineer, but since there are obvious errors with the technical geology and soils information, I have to question the accuracy of this entire report. I would suggest an independent study of this situation by some reputable organization such as the National Academy of Sciences. The BPA has now existed for 45 years and if the only thing they can recommend is powerlines across Western Montana, I think we should reconsider the administration of our energy needs.

For further information please feel free to contact me.

Sincerely.

Barry L. Buttor

UNDERGROUNDING: THE REAL COST OF ENERGY

The C.F.B.P.A. disagrees with the statement on Page II-32, paragraph 1 of the D.E.I.S. in reference to undergrounding the 500 KV lines in either Miller Creek or the Rattlesnake. That paragraph reads in part: "The trade-offs for reduced social and esthetic effects involve greatly higher costs and technical feasibility problems due to geological stability problems." The general impression given on Pages II-32 & 33 is that undergrounding the lines is not feasible. We believe that it is not only feasible, but that it is manditory for the lines to be undergrounded if they pass through high impact areas near Missoula such as Miller Creek or the Rattlesnake.

One of our ongoing problems with the B.P.A. has been the low priority they put on negative human impact these lines will have, ie. social, environmental and long term health effects. In the case of both Miller Creek or the Rattlesnake, these impacts far outweigh the cost or technical problems. We are going to suffer the costs of shipping electricity to the West Coast. Those costs are real.

Appendix E of the D.E.I.S. rebuts most of the concerns on Pages II-32 & 33 of the D.E.I.S. The appendix states that undergrounding reduces health and safety effects (page 5, paragraph 3) and drastically reduces the visual impacts of the line plus states that most negative impacts of undergrounding are temporary. We believe that temporary impacts are preferable to the long term visual, esthetic, social and possible health effects of an overland line in residential areas. So, given the findings of their own D.E.I.S. in Appendix E, why does the B.P.A. not wish to underground? The reasons are given: 1) reliability and 2) cost. On Page II-32 of the D.E.I.S., paragraph 2, the report describes the reliability of previously undergrounded lines as follows,. and I quote: "the operating history has generally been good." Thus reliability does not seem to be a real problem.

Undergrounding the line would cost approximately \$29,000,000 more than overhead lines. This is certainly a lot of money. However, if each B.P.A. residential customer paid for it over the life of the project, it would cost about \$1.50 per customer per year. (This includes 125% interest per year paid over the life of the project: 37 years). This is not an excessive amount. Compared to the billions of dollars wasted in the W.P.P.S.S. fiascow or the approximately 15 million dollars per year of lost tax revenue in Missoula County alone, which B.P.A. refuses to pay. The cost of saving the integrity of our valley is a small one.

Whether it's acid rain, air pollution or disposal of nuclear

waste, we must never again be fooled or fool ourselves about the true cost of energy. Consumers must be made aware each month in their bills, what the real costs are. With overhead lines, we in Missoula valley will pay a tremendous price so that cheap energy will get to the West Coast.

What we are saying is that if you come through this valley, we are not going to pay that whole price, we will not let you sacrifice the beauty and human environmental integrity of our valley for cheaper power in King County. If you come near people, put it underground! Submitted at public meeting Missoula, Montana 4/19/82

- TO: BONNEVILLE POWER ADMINISTRATION
- FROM: BARBARA EVANS, CHAIRMAN MISSOULA BOARD OF COUNTY COMMISSIONERS
- RE: GARRISON-SPOKANE TRANSMISSION PROJECT
- DATE: APRIL 19, 1982

On behalf of the taxpayers of Missoula County, I would like to encourage the BPA to take an active role in convincing Congress that payment-in-lieu of taxes should be allowed in addition to impact-aid.

It is illogical to assume that the impact of the Bonneville Power lines will be a <u>one-time</u> impact, and that therefore a <u>one-time</u> impact payment is sufficient.

The impact will be ongoing, and so should the payments.

This would help to reduce the tax burdens of Missoula County taxpayers

and make the powerlines more acceptable.

I recognize that we will probably not be able to stop the powerlines,

so in order to ameliorate the pain, I ask that the BPA make every effort to pay the same amount of money as Montana Power would have paid if they had built the powerline.

Thank you. BI



Submitted at public meeting Missoula, Montana 4/19/82

PAT WILLIAMS Montana Western District CONGRESS OF THE UNITED STATES HOUSE OF REPRESENTATIVES WASHINGTON, D.C. 20515

WASHINGTON OFFICE: 1233 LONGWORTH BUILDING WASHINGTON, D.C. 20515 TELEPIRONE:(202) 225-3211 TOLL-FREE NUMBER 1-500-332-4177

COMMITTEES, EDUCATION AND LABOR INTERIOR

#### STATEMENT OF PAT WILLIAMS

I am submitting this statement tonight on the occasion of the Missoula meeting on BPA's Draft EIS for the Colstrip transmission Lines. Tonight's meeting is significant because it is the first meeting to be held in one of Montana's major cities which will be impacted by construction of the lines.

As you know, my chief concern throughout the EIS process has been the health, safety, and visual effects upon those living near the proposed route. After the EIS was completed for the Colstrip-Garrison segment, I asked BPA to perform a study on the possibility of underground transmission near populated areas. Since my request, BPA has included the issue of undergrounding in the Draft EIS. It is significant that the Appendix on Underground Transmission Systems cites few significant impacts. It would be helpful if BPA would directly compare the benefits of undergrounding to overhead transmission in the Final EIS.

I encourage Bonneville to carefully listen and evaluate the comments of the folks in Missoula tonight. I remain convinced that these lines are best placed where the impacts to people are minimized, and I beleive that the concerns of people about health, safety, and visual impacts receive the highest priority in this decision.

This statement does not reflect the broad range of specific concerns I have about the entire project. However, I will continue to monitor with interest the process in each affected Montana community and comment accordingly.

Thank you.

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| Apr11 15, 1982  | JOHN SPELLMAN<br>Governor                                    | Law I  |
|---|--|--|
| To: George Badringe<br>Bonniville Power Administration<br>P.O. Bôx 4237<br>Missoula, Montana 59800  | 0  | STATE OF WASHINGTON<br>FFICE OF ARCHAEOLOGY AND HISTORIO<br>West Twenty-First Avenue, KL-11 • Olympia, Washington 9  |
| Prow: Aita Conn<br>Star Route<br>Hail, Monvana 59837  |  | April 8, 1   |
| Dear George,<br>I am greatly distressed by not only the kv500 line, but<br>by the way the BPA has treated the people in the Maxville area<br>but the people in Granite Co. in general. Several things I'd<br>line to bring to your attention.<br>(1) Several maps in your EIS are incorrect. (ne of the maps<br>I'm takking about shows irrighted land. Only problem with<br>unis maps is it shows very little if any irrighted land. I<br>don't know must my husband does with a showel and irragation<br>boots all summer, but evenently he quesn't irragate being<br>we have no irragated land according to your maps. And meither<br>do the Dennis, Boomer, Morrison, Granger, Leubetter, Lane,<br>wight, Anderson, and Hauptman rances. Not to count the   | Adminis<br>Bonnev<br>P.O. Bo<br>Portlar                      | lle Power Administration   |
| <ul> <li>Tancnes around Hail eve.</li> <li>(2) The maps that shows undeveloped - sublevided land. Many of the people whom you claim have undeveloped - subject thing like this and the land owner coesn't even know his own land is undeveloped - subject of our hay -krrighted hay land according to your map showing range, forest, farm land etc is shown as range. You coulon't b: further from the truth. Someone didn't do his or No her home work very well.</li> <li>(4) and speaking of home work, why if the Bpa has worked very hard at notifying land owners in the Maxville area was there a woman finding out ownerships less than 3 weeks ago at the Court house in Philipsburg???? I thought all this was done before decisions like what or what not is the better route.</li> <li>(5) In reading the KIS I found Maxville to be mentioned 4 times. And not once did it evermention the people in and around the Maxville area.</li> </ul> | A stafi<br>statem<br>cultur<br>project<br>Officer<br>environ | review has been completed of your draf<br>ent. We note your commitment to identif<br>l resources which are known or anticipa<br>area, and to consult with the State Hi<br>regarding the potential effects of the |
|   | 11   |  |

April 15, 1982

VI-108

And in closing i have more to say but will waite until the public meeting in our area. I however will say the Power line isn't really justified and abduldn't meetheingst báilt to begin with.

Rite Conn

L-MX-1-68

Ki Source Marian Got Calibra Contrange Microsoft

L-OW-5-3/3

C PRESERVATION 98504 • (206) 753-4011 C ANS. C NC REPLY

Action Taken Bv Dere

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ence: 124-F-BPA-14

mme: Garrison-Spokane 500-kv Transmission Project

ft environmental impact y, preserve, and protect ted to be present in the storic Preservation project on the cultural

al heritage.

Stump gist

BY FOLLOWING THE REALINE ALONG THE MONTANA/IDAHO BORDER YOUR LINE WOULD BE ON PUBLIC LAND. THE ROADS ARE IN. THE FORESTSERVICE HAS MOST OF IT CHEAR CUT NO PRIVATE LAND IS INVOLVED, AND NO ONE HAS TO LIVE IN; UNDER; OR AROUND YOUR PROBLEM\_

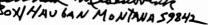
AT ST. REGIS WE WERE TOLD A BOUT HOW MUCH MONEY YOU HAP WASETED ON SO CALLED IMPACT STATMENTS. WHEN WE ASKED ABOUT THIS ROUTE HE HAD NOIDEA WHERE IT WAS OR WHY IT HAD NOT BEEN CHECKED OUT. HASIT BEEN RECENTING

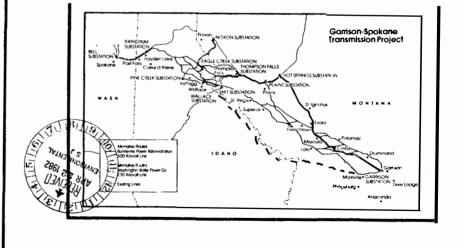
YOU DONOT HAVE TO LIVE WITH YOUR MISTAKES. THERE FORE NO OTHER TAXPAYER SHOUD BE FORCED

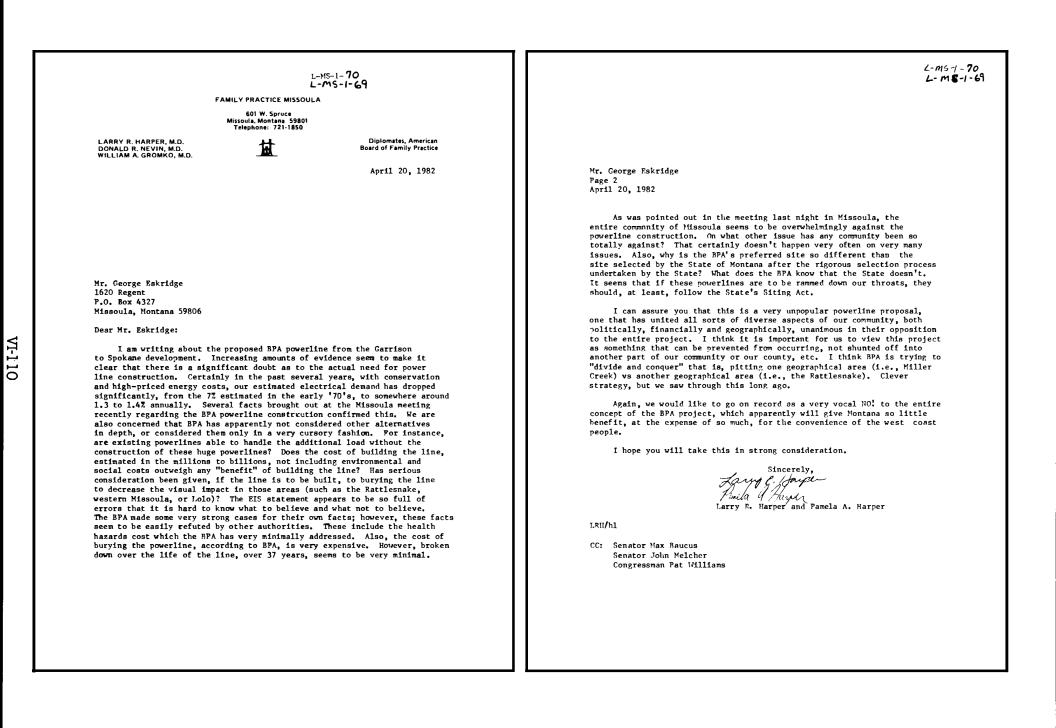
To WASHINGTON STATE IS ALMOST BANKRUPT FROM BUILDING POWER PLANTS FOR YOU TO SELL ELECTRICITY, IS THAT TO BE MONTANAS FATE?

WHERE ARE YOU STORING ALL THE SURPLUS ELECT-RICITY BEING PRODUCED NOW? OR ARE YOU WASTING IT?? YOU ARE CONCERIVED ABOUT PEOPLE BEING COLD - ARENT YOU?

I WILLBE HAPPY TO POST YOUR ANSWERS ON MY BULLETIN BOARD. Kenneth Mesenbrink Box 1 ennet Mecenbrick SOXI HAU GAN MONTAWA 59842 Haugan, MT 59842







| DEPARTMENT OF HEALTH & HUMAN SERVICES  | Office of the   | L-LL-1- <b>72</b>  |  |
|--|---|--|--|
|  | Principal Regional Official<br>Region VIII<br>Federal Office Building |  |  |
|  | 1961 Stout Street<br>Denver CO 80294                                  | Lolo, Montana<br>April 20, 1982  |  |
| April 21, 1982   | ROFEC   | Bonneville Power Admin.<br>1620 Regent St.<br>P.O. Box 4327  |  |
| April 21, 1982   |   | Missoula, MT. 59806  |  |
|  |   | Gentlemen: Re: "Environmentally preferred route" 500<br>powerline Miller Creek - Deadman Gu  |  |
| Mr. George Eskridge<br>Bonneville Power Administration<br>Transmission Coordination Office   |   | For the past 19 years my family and I have resided in the $W \ge NW = 0$ , Sec. 22, T12N, R2OW, PMM, on the West side of High 93 South, and about 2 miles North of Lolo, MT.   |  |
| Post Office Box 4327<br>Missoula, Montana 59806  |   | For about the past 16 years I have leased for livestock<br>grazing Sec. 16, T12N, R2OW, owned by the State of Montena,<br>the adjoining Sec. 21 to the South, owned by Champion Int.   |  |
| Dear Mr. Eskridge:<br>We have reviewed the DEIS on the Bonneville Power  |   | Timberlands. BPA is apparently currently considering having a 500-kv powerline pass through the North edge of said Sec. 16, South of Deedman Gulch.  |  |
| Garrison-Spokane 500-KV Transmission Project. (Transmission line will extend<br>across Montana, Idaho and Washington).<br>As the DEIS discusses at some length, construction and maintenance of such<br>a powerline does not involve large work forces at a single location over a<br>prolonged period of time. A DEIS preliminary conclusion states that,<br>"The geographically distributed and highly transient nature of the construc-<br>tion work force, combined with the very small permanent work force, virtually<br>eliminate the kinds of population-driven impacts (affecting housing, public<br>facilities and services, and the net fiscal balances of jurisdictions) that<br>characterize most energy development projects." |   | Moving the bowerline South of the bottom of Deadman Gul<br>to open sreas in seid Sec. 16 would have an adverse environme<br>impact on a considerable number of wildlife. This erea in Se<br>16 and all of Sec. 21 comprises the winter range of up to 50<br>of elk end the year around habitet of about 30 head of deer a<br>several bald eagles. On April 19th last from my residence I of<br>27 head of elk end on this date, April 20th, 43 head of elk,<br>24 deer grazing this aree within sight of motorists driving<br>on Highway 93 South from Lolo to Missoula. This is also calv<br>area for elk cows during May, each year. There ere elk in th<br>area from November thru May each year, with larger numbers du<br>Winter and Spring Months. |  |
|  |   |  |  |
|  |   | I am a retired F.B.I. Agent, was formerly Sheriff of M<br>County for 8 years, and am now engaged in ranching.  |  |
|  |   | John C. Moe<br>7750 Moe Road<br>Lolo, MT. 59847  |  |
|  |   | CC: Mont. Fish, Wildlife &<br>Parks Dept.<br>U.S. Fish & Wildlife Service  |  |

VI-1 1 1

1.-LL-1-72

#### Lolo, MT. April 22, 1982

Mr. Jim Posewitz, Administrator, Ecological Services Div. Moht. Pish, Wildlife & Parks Dept. 1420 E. 6th Ave. Helena, MT. 59620

Dear Mr. Posewitz:

Enclosed is copy of a letter I gave to Mr. George Eskridge, BPA Trans. Coordination Office, 1620 Regent St., Missoula, (Tel. 329-2727), and other members of a BPA team holding hearings on proposed 500-kv powerline. As planned this line would pass thru Cahoot Canyon, Lower Miller Creek, across the Bitterroot River, through the bottom of Deadman Gulch and proceed towards flue Mountain in Missoula County.

On 4/21/82 Mr. Eskridge stated that a proposal being investigated would have the line pass further South through State Sec. 16. This would apparently place the line within the winter range I described in the enclosed letter. Instead of observing elk, deer and other wildlife on the bald hills of the Southern portion of Sec. 16 during the winter and spring from four lane Highway 93 South from Lolo to Missoula, the thousands of motorists using this highway daily would be treated to a huge powerline with 175' steel towers.

The elk using this winter range apparently spend summer & fall in the Woodman Guld: - Blue Mtn. - O'Brien Creek area. Their relatively small winter range has been further restricted during the past 4 years by a subdivision and construction in Sleeman Creek.

It is respectfully suggested that interested State agencies may wish to consult with BPA in an effort to prevent severe adverse effect of the powerline on this progressively diminishing winter range, and the wildlife in this area.

Daily bald eagles can be seen from my residence circling this winter range for food. They apparently nest on the Vest side of Secs. 16 & 21.

Sincerely,

Mb. George Eskrid/je BPA, Missoula Mr. Gareth Moon, Comm. John C. Moe 7750 Moe Road Lolo, MT.

Dept. State Lands. CC: U.S. Fish & Wildlife Service Mr. James H. Kuechmann, Supervisor Special Uses Section Forest Management Bureau Mont. Division of Forestry L-LL-1-**73** L-LL-1-74

Lolo, Montane April 21, 1982

Mr. George Eskridge 1620 Regent Missoula, Mt. 59506

Re: SPA Fowerline through MissoulaCounty

Dear Sir:

We wish to express our objections to the proposed route of the 500-Av powerline in the vicinity of Lolo, specifically Sections 21 and 22, Township L2N, Range 200.

This area has been a range for a large herd of elk, plue deer, for the pest forty years that we have resided in the area. There are eagles, foxes and numerous wild life which we have always tried to protect from human invesion. It would seem unreesonable to install a huge powerline that would be detrimental to this pristine area. There are many alternatives, including your original plan to run it in conjunction with the swath already cut through Montana. The line could be buried in those areas offensive to human habitation.

We would like to have the proposal of Senator Melcher addressed as to why the power couldn't be untilized in closer proximity to the source. Residents of Montana would be most agreeable to a cheaper energy supply.

We respectfully request that you carefully consider the impact the powerline would have on the people of the Bitterroot Valley.

Yours very truly, <u>I'mhard</u> / assignate Richard Rossignol

Richard M. Rossignol Box 128 Lolo, MT 59847

|                                 |  |   | 1 - SK • 5 -   |                   |   |   |
|---------------------------------|--|---|--|-------------------|---|---|
| United S<br>Departm<br>Agricult | tent of  | Soil<br>Conservation<br>Service           | Room 360<br>U.S. Courthouse<br>Spokane, Washington 99201   |                   | L- <b>cm</b> -1- <b>75</b>  | BOX 784, RONAN, MONTANA 59864             |
|                                 |  |   | Apr  | ril 19, 1982      |   |   |
|                                 |  |   |  |                   | NORTHWESTERN NATIONAL LI  | FE INSURANCE COMPANY                      |
| Bonne<br>Trans<br>P.O.          |  | dministration<br>dination Office<br>59806 |  |                   | ART AYLESWORTH  | OFF: 408 - 676 0300<br>RES: 408 - 6768100 |
| Dear                            | Mr. Eskridge:  |   |  |                   |   |   |
| state                           | ment for the   | Garrison-Spokan                           | reviewed your draft environment<br>e 500kV Transmission Project. I<br>d the areas of concern to our ag | It would          |   | April 23, 1982                            |
| Thank<br>Since                  |  | opportunity to                            | review your draft.   |                   | Mr. George Eskridge<br>Bonneville Power Administration<br>Transmission Coordination Office<br>P. O. Box 4327<br>Missoula, Montana 59806 |   |
|                                 | A. BROWN   |   |  |                   | Dear Mr. Eskridge:  |   |
| State                           | Conservation   | list                                      |  |                   | Enclosed is a copy of a letter  | I sent to Mr. Worth, Project              |
|                                 |  |   |  |                   | Engineer of the Bonneville Power Admi   |   |
|                                 |  |   |  |                   | have a copy of it.  |   |
|                                 |  |   |  |                   |   |   |
|                                 |  |   |  |                   |   | Sincerely,                                |
|                                 |  |   |  |                   |   | / / 0 0                                   |
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|                                 |  |   |  |                   |   |   |
| ( ), is an age                  | Conservation Service<br>ncy of the<br>int of Agriculture |   |  | SCS-AS-1<br>10-79 |   |   |

VI-113

L-OM-1-75



#### NORTHWESTERN NATIONAL LIFE INSURANCE COMPANY

MONTANA AGENCY • KALISPELL DISTRICT ART AYLESWORTH • SALES REPRESENTATIVE OFF: 406 • 676 0300 RES: 406 • 676 8100

April 23, 1982

Mr. Franklin Worth P. E. Bouneville Power Administration P. O. Box 3621 Portland, Oregon 97208

Dear Mr. Worth;

I visited with you last week at a hearing in St. Regis, Hontana. The purpose of our discussion was the proposed 500kv line which your maps show as passing directly over my home 2% miles east of St. Regis on Highway Route 135. My property is riverfront property below the highway and railroad. I am opposed to this particular line route for several reasons which I have listed.

- 1. I do not want this line over dy home or within 500 feet of it.
- 2. In dry years, we have a problem with grounding the power line that feeds our property at the present time. We get electrical shocks from water faucets and switch boxes even though they are properly grounded. Hy electrician says your line running through this area will complicate this problem and will certainly make it worse.
- 3. The property I 000 will certainly be devalued in the mardetplace if this crosses over it. While it is ideal as subdivision at this time, it would lose its appeal for that purpose with this line running over it. Not only would I lose property to the line right of way, but also to the value of the remaining land and my home.
- 4. It would appear to us that you would need one tower in the flood plain across the river from my property. This appears to be a very dangerous loc location to us.
- 5. A line in this area would cartainly infringe on the air space needed for the private air strip located at St. Regis.

Sincerely,

#### PLAINTIFF MINERAL COUNTY'S ANSWER TO DEFENDANT'S INTERROGATORY NUMBER 70

The County of Mineral will sustain a variety of damages should the BPA 500 KV powerline be routed through our jurisdiction. While the majority of the proposed route traverses U.S. Forest Service land there will be considerable impacts on private land and governmental services. Mineral County presently has only 12% of its territory in private ownership. The extremely small size of the private land base places a premium on careful land-use planning. The loss of any private land which could be used for agriculture, subdivision, recreational development, commercial use and/or open space of high aesthetic quality will be a severe detriment to the comprehensive planning process in Mineral County. Nearly a decade of federally and locally funded planning will be compromised, ignored and over-ridden by the proposed BPA actions. The damages to the economy, the natural and cultural landscape and the county's efficacy as a governmental body will be highly significant should the BPA corridor pass thru this area.

(1) The principle damages to agricultural land will take place downstream from St. Regis in the so-called "Cut-Off Road" area. The irrigated pastures and haylands of several ranch operators will be impacted. The HUD funded Mineral County Comprehensive Plan of 1977 states that "Agricultural land, even though not strategically important to the total state economy, is critical to Mineral County's economy and geographic character. While it is true that the land under easement for the powerline could continue to be used for agriculture, it is highly instructive to note that the re-routing of the line thru Granite and Powell counties was done as the direct result of problems foreseen by ranchers. The line was removed from irrigated pasture lands. These ranchers spoke of the severe health and safety problems involved with irrigating haylands near the immense energy field created by the one million volts carried by the BPA facility. BPA's decision to re-route the line is a concession that these arguments were valid. Impacts on agricultural production will occur in Mineral County as a result of the line since ranchers will downscale the intensity of use of corridor lands.

(2) Carefully planned subdivisions are of great benefit to the local tax base, business community and quality of life in Mineral County. The power line will eliminate the possibility of lands with excellent developmental potential from ever supporting desireable residential or commerical developments. Existing subdivisions in physical and/or visual proximity to the line will have a greatly reduced marketability. The Cut-Off Road area has several subdivisions where lots would become far less attractive to potential buyers as a direct result of the visual deterioration in the area. One of the Mineral County's primary markets for lots is the Coeur D'Alene/Spokane region. Individuals from these communities buy land in Mineral County for retirement, recreational and second home use and are drawn by the pristine environment and high scenic amenities found here. Subdivisions in Saltese, DeBorgia, Haugan, St. Regis and Superior are examples of this phenomenon. The powerline would severely reduce these market conditions. Land adjacent to the corridor will have its saleability damaged for all types of uses. All these forces will reduce the optimum tax base of Mineral County. Tax base expansion has always been a major goal of the planning and economic development process within this jurisdiction (Overall Economic Development Plan 1981, Mineral County Comprehensive Plan 1977).

(3) Recreation and open space impacts will also be considerable. The transmission right of way will cross a mountain zone recognized as an "Outstanding Natural Area" under the Mineral County Recreational Facilities Plan (HUD1978). These areas were recommended for "sightseeing and enjoyment of natural attractions" Developments were to be "limited to the minimum necessary to protect the features". Improvements "should harmonize with and not detract from the natural settings". The powerline will have overwhelmingly negative effects on these environmental and scenic values. The Clark Fork River Recreational Corridor Plan (HUD 1979) and its Implementation Plan (HUD 1980) recommended that the land-use emphasis be on "the scenic beauty and ecological integrity of the river, riverside land and canyon walls". Efforts are underway with the Montana Dept. of Fish, Wildlife and Parks to acquire the "St. Regis Landing", a large peninsula containing exceptional scenic, environmental and recreational values. The line will pass in plain view of this key acquisition in the implementation of the Clark Fork River Recreational Corridor Plan. The aesthetically sensitive Cut-Off Road area has been considered for status as a state Scenic Route. The Lolo National Forest Plan calls for dispersed recreation and highlights the visual importance of the canyon. These open space values will be severely degraded by the existence of 175 foot tall towers looming over the landscape. Dude ranching (for example the Black Diamond and Broken Heart dude ranches), cross-country ski resorts and other recreation oriented businesses will be impacted by the environmental perturbations inherent with transmission corridors and access roads. The corridor will bisect existing critical winter and spring range thermal cover and calving grounds for elk and deer. This fact far outweighs any conceivable habitat improvement brought on by the elearing of the right of way. Additional access raods may encourage excessive harvesting of game animals, poaching and harassment of wildlife species vital to the local ecology, economy and quality of life. Moose, black bear, ruffled grouse, fox and other creatures may decline due to stresses linked to the proposed development. A wintering population of endangered American eagles exists in the impact area. Bald Hill has been identified as a "Natural Environmental Area" (Recreation Facilities Plan 1978). The impacts on watersheds and water quality may influence downstreat trout.

(4) The corridor will impact three municipal watersheds. The springs above Alberton, Flat Creek above Superior and Packer Creek above Saltese will all be crossed. These sensitive drainage basins have restrictions on timber harvesting and other activities in order to protect the quality of water on which these three communities depend.

(5) The BPA transmission line will traverse the "Keystone-Pardee Historic District" which under the Montana State Historic Preservation Plan should have its management" limited to activities that would preserve and restore the historic resources" (Recreational Facilities Plan 1978). The power line will also pass near the "Old Ferry Crossing" historic site on the Clark Fork River downstream from St. Regis.

(6) Mining claims will be more accessible to the public as a result of the construction of access roads. Miners will encounter problems with trespass, theft and vandalism. This will create the need for additional police protection, investigation and criminal litigation. The work load of the Mineral County Sheriff's Dept. will increase all along the corridor due to an influx of workers. After the line is completed law enforcement expenditures will remain high in order to police the corridor zone.

(7) County roads will be heavily used during the construction phase. This will cause physical deterioration and the need to spend more funds on maintenance and repair. The county will encounter additional expenses since access roads through National Forest lands have historically involved shared maintenance obligations with the Lolo Forest.

(8) The effect on television and radio reception is an unknown variable. If reception is worsened then local government will have to pay for improvements to boosters.

(9) U.S.F.S. Forest Receipts funds provide a substantial portion of the county road and school budgets. /These funds are dependent upon sustained yield forestry practices mandated by Congress in the Multiple Use Sustained Yield Act. The transmission corridor will be a swath 130 feet wide and roughly 50 miles long. This amounts to approximately 800 acres of land which is removed from timber harvest in perpetuity. This represents .125% of the 640,000 acres of Lolo Forest land in Mineral County. Forest Receipts have averaged roughly \$2,025,000.00 per year and removal of .125% of the resource base reduces the amount of Forest Receipts by the same percentage or, over \$2,500.00 per year. Over a 50 year period this means that Mineral County will lose \$125,000.00 requiring school and road funds to be made up by increasing the already high local taxes. Alberton currently has the 3rd highest taxes of any community in Montana and Superior the 4th highest. This is a direct result of having 88% of the county land in tax exempt status. BPA's actions will reduce Forest Receipts funds, remove even more private land from the tax rolls and have as yet unclear effect on U.S.F.S. payments-inlieu of tax payments to the county.

#### BPA POWERLINE PETITION

WE the undersigned residents of Mineral County are strongly opposed to the placement of the Bonneville Power Administration's 500 KV powerline in Mineral County. The negative impacts on land values, tax base, public health and safety, radio and TV reception, agriculture, wildlife, scenic resources and many other factors makes the "Southern Route" totally unacceptable to us. Only 12% of our county is private land. We simply cannot afford to lose the productive use of a single square foot of private land. The existing powerline right-of-way through the Flathead Reservation should be used before any new corridors are taken. Be advised that we are unalterably opposed to the construction of the BPA powerline through Mineral County.

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#### BPA POWERLINE PETITION

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WE the undersigned residents of Mineral County are strongly opposed to the placement of the Bonnevile Power Administration's SOO KV powerline in Mineral County. The negative impacts on Land values, tax base, bublic health and safety, radio and TV reception, agriculture, wildlife, scenic resources and many other factors makes the "Southern Route" totally unacceptable to us. Only 12% of our county is private land. We simply cannot afford to lose the productive use of a single square foot of private land. The existing powerline right-of-way through the Flathcad Reservation should be used before any new corridors are taken. Be advised that we are unalterably opposed to the construction of the BPA powerline through Mineral County.

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Peter Johnson, Aministrator Bonneville Power

#### Dear Mr. Johnson:

This is to confirm my telephone discussion with you earlier today. I have notified Max Peterson, Chief of the Forest Service, of my dissatisfaction of the Environment Impact Statement for the routing of your transmission line from Garrison west until it leaves Montana.

I wish to make the following points clear:

 The present draft of the Evnironmental Impact Statement is unacceptable to me in several areas and I believe must be corrected if the line is to be approved and constructed.

2. The transmission line should be rerouted to avoid population centers and to be at least one mile from residences.

3. Aesthetic values comparable to those required under the Public lands policy Management Act and the Forest Management Act must be adhered to under public lands and also be adhered to on any private lands that the line might impact. Aesthetically, I am drawing your attention to high aesthetic values concerning visable impact by private land owners.

4. Condemnation procedures on private land should not be threatened by the Bonneville Power Administration and the Construction route should avoid farm land unless agreement is received from the land owner.

5. To avoid any of the above problems, Bonneville Power Administration should bury any portion of the line necessary to alleviate those impacts.

APRIL 27,1982

6. As part of the Environmental Impact Statement before it's completed, consideration should be given to routing the line from Garrison Southwest on National Forest lands toward Sula in an attempt to cross the Bitterroot Valley into Idaho, with the least amount of impact aesthetically (including visual.

Please be advised that I and my staff will be pursuing all of the various alternatives that are available for the routing of this line but that the present routing and the draft Environmental Impact Statement is definitely unsatisfactory. Your consideration will be appreciated but I must emphasize that we will be needing sufficient time over the next several months to examine other alternatives.

Since the present draft Environmental Impact Statement is unsatisfactory to myself and many other Montanans, I have advised the Forest Service that consideration should be given to ending the Line at Garrison and using the power elsewhere, and this should be one of the alternatives of the final Environmental Impact Statement.

Kindest personal regards.

Sincerely,

John Whelcher

SUBJECTE BP.A. MEETING HIGH VOLTHEE LINE SUPERIOR MENTANA

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Since are in Pringing SAMUEL E. D' RUESS

Lolo, MT. 4/23/82

Mr. George Eskridge BPA Trans. Coordination Office 1620 Regent St. P.O. Box 4327 Missoula, MI. 59806

Dear Mr. Eskridge:

Enclosed herewith is copy of a letter I am sending to Mont. Fish & Wildlife & Parks Dept., Montana Division of Forestry, U.S. Senators Max Baucus & John Melcher, and to Congressman Pat Williams.

I was impressed with concern, cooperation and fairness of all the members of the BPA Team at the hearings in Missoula & Lolo.

Since I am familiar with the area described in my letter, I would be happy to take any of the members of the BPA team on a tour of the area.

In the event BPA seriously considers construction of the power line through the winter game range I have described I would appreciate being advised, as I am sure would all the residents of the Lolo area and the Bitterroot Valley who drive to Missoula almost daily.

Sincerely,

they here John C. Moe 7750 Moe Road Lolo, Mf. 59847

Dear Sir

I am 10000 agaist you people to aring up yet and ther County. your line would be an invasion of more fed. Control in our County. it. like lats of o turs moved here to get away from power lines and large Concentrations of people. Why not run to line up nor the where they already house power lines or as last resort bory the dama -thing in to middle of to rever. I don't know anyone in this area who favor your agencys policy of Rape and Rone if eastern wash wants power lot tem boild Their own plants tone, or botter yet, you boild it over the for them.

Ron Peterson

Ronald G. PETERSEN P.O. Box 168 DeBorgia, MT 59830

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I.-MS-1-77 THE WESTERN MONTANA CLINIC 515 WLY- FROM STREET P O BOX 7000 MISSOULA: MONTANA 59807

TELEPHONE 721-5000

April 26, 1982

George Eskridge Bonneville Power Administration P. O. Box 4327 Missoula, Montana 59806

Dear Mr. Eskridge:

I am writing as regard the new proposed power corridors through Missoula County. I am responsible for a large piece of ground in Miller Creek through which the proposed Miller Creek route would course. I have some ideas on these power lines which I would like to share with you.

First, obviously I am not very anxious to have powerlines of this magnitude go right down through the middle of the Miller Creek ranch known as the Maloney Ranch Corporation.

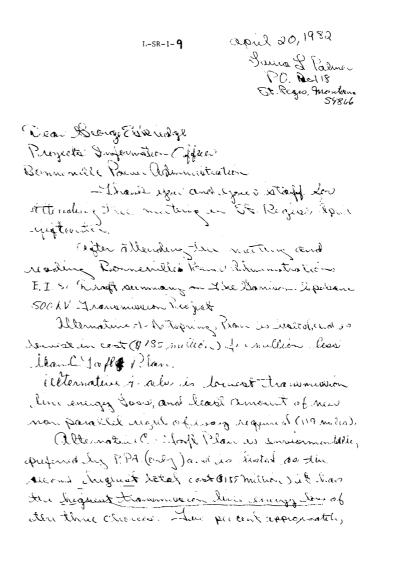
ousremuscance of construction. Secondly, I am informed that there is an existing corridor that courses from the Garrison area to Hot Springs which is already purchased and already has most of the access available. It would seem to me that this option of utilizing the existing corridor would certainly be the sensible thing to do at this time for reasons first of economy, not having to repurchase a number of other areas and corridors, and secondly convenience of construction.

> I am not adequately appraised to evaluate the ecologic and esthetic effects of powerlines of this magnitude, however, I am sure that you have obtained more than sufficient information about those particular aspects. It is unfortunate that undergrounding is not a viable option for the few miles it would take to course through the Missoula Valley but I will take you word for it that this is not currently feasible.

> In conclusion, I would strongly urge that serious reconsideration be given to the exisiting corridor and not make it necessary to cut Missoula County with another parallel high voltage transmission line.

Sincerely yours, CCo Yal MI Crack

C. G. "Pat" McCarthy, M.D.



CGM/rf

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ADMINISTRATION

a work the the these pitters Concerned City. aprix 28,1982 Farry & Farry Freputs prime Frequerical water Aur 3 PA. EIS connected for Proper sporen - Harven Tay page P.O. Box 18 St. Regis, MT 59866 L-SR-3-9 Hurye Estaulige two million dollars amally Devent million dollars non paralled right of way nucled (324 miles) fund a she the the selver spin , calmer going Ilie route merced definition have the remember when werde mayo on I amound Will and Due su druch rusiality at St Days Jor 5.10 alour people, more public land, and would not deme your's clear entruents in dourstating on unnecessary. He wight af the EPA meting oner the thirt fire yes Joreand of Iles power alternative C. Laft Plan also has most new Alse Lamarak Sill rente mould appert Bernerell Cours J. Palmer The destruction of sugery or more mine of 6-1-25-7 nules, as mary inter merid he. halitat and mildfife, American Coordination APR 2 9 1942 A DETER

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Retyped from article submitted

LINE HURTS US ALL

After hearing the bad news of huge electricity rate increases because of the WPPSS flasco, the choice of BPA's 500-Kv powerline location is the concern of all electricity users, not just the people who will be living near it. Its location will affect everyone's bills, all Montana Power and REA customers.

Upon reading the EIS Summary sent by BPA and comparing the three alternatives, I believe the choice of location should consider cost as well as environment,

Alternative A--Hot Springs Plan, is listed as the lowest total cost (\$185 million) and also has the lowest transmission line energy loss and least amount of new non-parallel right-of-way required (119 miles). I believe this route could prove to be the most economical for ratepayers.

The alternative that is being pushed through the media as if it is already final, which it is not, is Alternative C--Taft Plan. This is environmentally preferred by BPA. This plan is listed as the second highest total cost (\$189 million) and has the highest transmission line energy loss of the three choices and most new non-parallel right-of-way needed (224 miles).

The decision of where these powerlines are placed will not please everyone, but I think we all understand that none of us can put up with the neverending increases in electricity rates.

We can't just sit back and let another WPPSS happen. We should all get involved and encourage the building of the powerlines where it will give us, the customers, the cheapest rates.

Now is the time for all affected to speak up. We can't let a few people make the decision for us. We should read the EIS Summary and make up our own minds because all of us will pay no matter where the line runs through Missoula.

My vote goes to the Hot Springs Plan--Lorraine C. Houppert, 1025 Lost Mine Loop, Missoula.

Line hurts us all L-5R-3-9 After heating the bad news of huge electricity rate increases because of We, the undersigned, strongly support the views the WPPSS fiasco, the choice of BPA's 500-Ky powerline location is expressed in the letter on this page, the concern of all electricity users, not just the people who will be living near it its loca ion will affect everyone's bills, all Montana Power and REA ADDRESS customers. Upon reading the EIS Summary Rebergia Bey 14 InJ. sent by BPA and comparing the three alternatives. I believe the choice of loin the cation should consider cost as well as Seattanty environment 55366 Box 156 St. Reg, tran Hauses bt SEG45 A. Bargle The alternative that is being 11:60 pushed through the media as if it is aleady final, which it is not, is Alterna-× Decala, hit This is environtive C mentally preferred by BPA. This plan NU 5186 ST JE9:5 ANT SYSTE The decision of where the se power-26. De Bergen, Jul 57850 lines are placed will not please everyone, but I think we all understand that BOX794 Runone MT 59864 none of us can put up with the neverending increases in electricity rates. We can't just sit back and let an-other WPPSS happen. We should all get involved and encourage the build-ALBORGIN, 147. ing of the powerlines where it will give us, the customers, the cheapest DERORG rates . 5 1 We can't let a few people make the decision for us. We should Slid read the EIS Summary and make up our own minds because all of us will pay no matter where the line runs through Missoula. - Lorraine C. Houppert, 1025 Lost Mine Loop, Missoula. ST Acges 19 IN KC 42 Stilens MH 576 K 8] TON, 1:00

Line hurts us all 1451 L-S R-3-9 kime hurts us all After bearing the bad news of huge After besing the baid net.s of hug-electricity rate increases because of the WPPSS fiasco, the choice of L-SR-3-9 electricity rate increases because of the WPPSS fiasco, the choice of We, the undersigned, strongly support the views We, the undersigned, strongly support the views BPA's 500-Ky powertine incation is the concern of all electricity users, not BPA's 500-Ky powerline location is the concern 50 M electricity users, not just the people who will be living near it. Its focation will affect everyone's expressed in the letter on this page. expressed in the letter on this page. just the people who will be living near it. Its location will affect everyone's bills, all Montana Power and REA bills, all Montana Power and REA NAME NAME ADDRESS ustomers. customers. Upon reading the EIS Summary sent by BPA and comparing the three alternatives. I believe the choice of lo-cation should complete cost as well as Caralyson Mekk 8 St Leges, mr. 58844 Uppe reading the EIS Summary sent by BPA and comparing the three alternatives. L'actions the choice of lo-ration, minite comparing cost as well as environment. Louis gla Burr Specia ast Courses M Place Il Stails 4 the f 59866 r. CANKE BC428 SILLONIS Kinda: Cellaria a Glin ST. Kelis The Y. 1122 all Deside Allian Milling ManTANA A 1201 1 inst String Whine Park Lex 223, St Legio, not 51866 SE PLASS MIT 12 - Culteris Dun The alternative that is being i Degra mt The alternative that is being pushed through the media as if it is al-ready final, which it is not, is Alterna-Livere , 11 Sec. Starte 45 JUL. pushed through the media as if it is al-ready final, which it is not, is Alterna-201 Allala 11 4 1 . is the in nit 1 Recks Hill Donnie tive C --This is environ This is environnentally preferred by BPA. This plan Kt2 Box S03B Superic Mt mentally preserved by BPA. This plen ura Suttinet 9D roll Maky's. fer ser 130x 27 Listh / Amont 134 217 ST ATEN MT The decision of where these po-The decision of where these power-St Rec By 410 It Regi, The. The decision of where these power-lines are placed will not please very ... one, but I think we all spdents and that mape of us can put go which the pever-ensing increases in spectricity rates. We can't past ait back and let an-other WPPSS bappien. We should all get involved sed empourage the huild gree in the employee, the cheapest rates. Inda Walika lines are placed will not please chestillone, but I think we all understand ant agne of m can put up with the aver-ending increases in electricity rates. Mike Lapustei Thene to Y konden In Melia Box 807 Superior We can't just ait back and let an-other WPPSS happen. We should all P.O. Boy 807 Superior, mt. Jiepapina get involved and encourage the baild-ing of the powertimes where it will give us, the castioners, the chapert Pa Box 332 At Reger mit Tin Att 23 e sula 4 His with Myeser bring P.O. Bol 315 At. Riger York Sarbarb Litor rates. 215 St Regis 1.412 l'and Clock Lary & Room in We can't let a few people make the decision for as. We should read the EIS Summary and make up Box We can't let a few people make the decision for us. We should St. Refis NEN TA X Durt Sr. C Box 85acquite anger read the EIS Summary and make up our own minds because all of us will Taulast Minh our own minds because all of us will pay no matter where the line nuns 1.11.6 ( leah 16: 308 23 57. KSGIS Karite 1224486 pay no matter where the line runs. through Missoula through Missoule 90 Grav 337 st. Kegy Im Vour the. det. F? Lost Mine Loop, Missonia. - Lorraine C. Houppert, 10 William 1 lation. pac ? ost Mine Loop, Missonia Kiges Kilicia J. anon Sit letructor N Aher DeBorgia an Anneide い液で Election Lilley Reberge ( letter ley) Ber 43 nuce Altman Finne Po Bex 331 ATTage The 545 de St. Kegis Truk Cilm Zenous. PC Bex 283 St Registert STACE St. Regio Clara Loge St. Regis nuchael atox PO EAX 315 ST. Roger MI SING St. Regis By & Steinhen General Delivery St. 20315 All. 57566 Regis William C. Ross P.O. BOX 125, ST. REGIS MT. 59866 loe R.Wolf Justin Gambia Leonard W. Smith RD. Box 509 St Regis NH 59866 St. Regis POBOY 23 Stroyis Mt STREE N. Longlas H. Kegis OVEF. Chuk Schweder P.O. Box 48, St. Regis

Line hurts us all Name Florkess fin Shope Box 8 St. Regis Scott Kart Box 185 St. Regis Burnerd Battern SRB 512 St. Regis Noom Battern SRB 572 St. Regis Probattes Cabin Chy, Houtman Del Losta Cabin Chy Hortana Michele Woodson St. Regis Mt. Concertifice Theorem 171:55-1 And hearing the bird news of bag-electricity rate increases because of the WPPSS flasco, the choice of BPA's Sol-KN powerling, location is the concern of all electricity mers, not just the people who will be living near it. Its location will affect certrone's birs all monhan Power and REA. L-SR-3-9 We, the undersigned, strongly support the views expressed in the letter on this page, bills, all Montana Power and REA NAME ADDRESS customen. Upon reacting the EIS Summary sent by BPA and configuring the three alternutives, I believe the choice of lo-cation about computer the well as environment. customen Buty Jukran Superier They Mint) iii The alternative that is being pushed through the media as if it is already final, which it is not, is Alternative C - This is environ-mentally preferred by BPA. This plan St. Regio Mt St. Rigis, mt. Ken artman Madine Workey Bill Warkey The decision of where these powerlines are placed will not please everyone, but I think we all understand that one, out i tunkt we all anderstand that name of us can put up with the never-ending increases in effectivity rates. We can't just sit, back and let an-other WPPSS happen. We should all get involved and encourage the build-ing of the powerlines, where it will one at the contents. Jachie Roll -tachen Int. give us, the customers, the cheapest rates. make the decision for us. We should read the EIS Summary and make up our own minds because all of us will pay no matter where the line runs through Missoula. - Lorraine C. Houppert, 102 Lost Mine Loop, Missonia. 8.5

A for Les ing the bid new, of bir, electricity rate increases bequee of the WPPSS fiasco, the choice of \$ 56.3-9 ongle sensort the yiers the undersi Wet. BPA's 500-Ky poweritine location is the concern of all electricity lines, not expression in the Testion this a just the people who will be living near it. Its location will affect everyone's L-PL-1-109 bills, all Montan, Power and REA A121, 20,02 the EIS Summar lanus aring the three Ponneville Fordr Adm. aiten ice of lo W. CPO Riverside Ave. catic: Spo and Thet. egeos mt Dear Sire. The most important topic of concern EDHS. m 1-2 of an environmental incost statement of today ghould be energy indepadence. Bachery independence will not cont they, and not 19916 611 without some about term executioes. In only that we 29547 without some short team successed out, if ones, then may all enjoy the ever improved team filler of electricity, we must merid file nome of the other enjoyments of environment. Shortwest of environment, in the file and compare of environment, when whereas a statistic team to reduce prices for every to successful compare The alternative that is being pushed through the media as if it is al-ready final, which it is not, is Alternative C - This is environ-11/1000 59862 an Mt. 59866 59866 We much continue to resure our desendence on oil decision of where these power by converting to obtain he me of enery strates elected to one of the electricity of elected there, to model our much needed can by "C much excepted every concept in the field of electricity of and the means to lines are plac d will not please every one, but I think we all Acra 1. list none of us can put u th the preverno Permapoi it to oller Loritog. Permapoi chrimanentel ertechiste and galletion should all 6512 19105984 the cost of the Alegian whether which yes be welly fille cost of the Alegian whether which yes be welly fille willion and to be excepted in 1/7°, now cost mine billion and was not completed untill 1/7. St. Byn Wet Sille 211 St hagis 15.4 Those with the the formation in the second terms and the second s should read the EIS Summary and make up to digrade any contact, enclided and contribute to inflation and uneral operation Our thole life comparis to the property to be the standard of the two mains and the standard of the two the standard of the two the standard of the standard o Samel C Silvertion, Si. (a) 102 20 mining, T. Spos 18.2

3. Your discussion of health and 5 specify effects (p. 10) is totally inadiquate. What and is an your reputing to ? What have been this findings ? What about effects of AC version DC ? What hinds changed preeseis in power demand. straure of the clales, ID mines. man't to direction the effects of a proposed action on the human environment. This document foils To do so. It morely hat they effects as "anes of Controvery" The "lanking Summary", Talle 2.3, ques no inducation of the 4. an Environmental Statement is indicated by the shutdown of The WUPSS nuclear plants and of effects have been found, and how "remote" are they? L-MS-1-190 Opent 26, 1982 2. The entire basic assumption of at all, or superficially directed to question the cudulity of your Spokane 500-KV Tranamación Projecí the DE2's an either not addread need for the power much be se-examined in light of recent 1. I sauce I raised in reporter to your request for public input on My observations on the Darman public instrement proceed. Somedell Power admin. DEIS are a follows: Meanula, MT 5-9806 P.O. Sox 432.7 Dear Sin: VI-127

L-OM-1- 204

## April 30th, 1982

My name is Don Valiton. I live on a ranch in the Blackfoot Valley, near Ovando, Montana, which is my address. I am also a landowner and taxpayer in the Deer Lodge Valley, which may be affected by the proposed BPA power line construction.

If, and when, these lines are built, I strongly urge that they be constructed as much as possible, on federal lands, and away from people. If there are conflicts with landowners and residents over such things as interference with irrigation systems, buildings, roads, etc. - - that BPA personnel exert every effort to work out a satisfactory solution with the landowners and residents, re-routing segments of the lines, where necessary - - even if additional expense is involved.

I urge adequate and generous monetary compensation to landowners for rights-of-way taken, and for damages inflicted.

The Blackfoot Valley, and its way of life, is one of the most beautiful in all the West. Please plan your line routes to avoid descerating it. We want no eye-sores here! Strict compliance with Montana's Major Facility Siting Act should be followed.

To construct these lines with minimum, detrimental impact upon the residents and landowners of Western Montana, will cost more. To we, who live here, it will be worth it. The power going over these lines will have been generated within Montana. Most of it will go to customers outside our state. Any additional costs to preserve our way of life, should be borne by those out-of-state customers, who will benefit from this power of ours.

If private utilities were to build these lines, the counties and school districts through which the lines would pass, would receive very substantial taxes. This would ease the burden on those already over-loaded taxpayers in those areas.

The U.S. Forest Service now makes a form of payment inlieu-of-taxes to counties. The Montana Fish & Game Department makes payments in-lieu-of-taxes to counties, on lands it has acquired. There are other examples.

istent on importance of the importo. What does it near to say that in Terms of descripting people's defeatyles, Taft is a "1" and Plains is a "2"? Etc., The "advantages" and "Dissdearty or of each Plan suffer from the same failure. You should quartify and leacrite what is meant by "least (or , most ) effect," "least (or , nost) descriptions make meaningful comparison of the siteration impossible.

In summary, the present DEIS fails to meet requirements of the Environmental Policy act and I suggest you prepare a readed Draft. Windell Geordsby

600 Colorado Dulch Missoula MT 59802 L-0m-1-204

To date, the Bonneville Power Administration, to my knowledge, has indicated neither the desire nor the willingness to make payments in-lieu-of-taxes.

On the contrary, they have claimed that they do not have congressional authority to do so - - and this has been debated. If there is any question on this point, I strongly urge the BPA to support Congressman Ron Marlenee's bill, now pending in Congress, which will specifically grant you the authority to make payments-in-lieu-of-taxes. I ask that your people appear at the proper congressional hearings in Washington, D.C. - and support the Marlenee bill without reservation.

on Valitor

Don Valiton Box 66 Ovando, Montana 59854

L-5K-1-9 OFFICIAL FILE COPY and 28, 1983 Source S. Palmer PO. Bat 13 St. Reegio Hand 59866 APR 3 0 1982 Acron Taken JANS. [] NO REPLY De'e Dear The Peter T. Johnven,

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Please keep my name on your Garrison-Spokane mailing list. Please correct my name/address: Should read as follows (print clearly) Name TED DOHERR JR 324 NOVA WY CHULA VISTA CA 92011 Organizatic \*TED DOHERR, JR. 423 NOVA WAY CHULA VISTA, 32.4 CA 92011 Address City, State, zip code Please remove my name from your mailing list. Thank you for sending this sheet back to us. We appreciate your help. You for sending this sheet back to us. In approach ON YOUR THANK YOU FOR KEEPING HE ADVISED ON YOUR PROGRESS I BELIEVE THE EWNER' NEEDS THE PROSECT. In the congressional Repart univer dem Swotz gues Bared the BIPA in anurine the guidenes askonech second to a labor their information also in their its. , and in hitself as the the highest the music - him energy live, of allonation a - Japt Plan is inverse second Anghues tetas cost (\$139, mullion), it have the three chieves, and meet new non practice 1000 right af every needed ( 224 miles). The destination すつし of the miles of clear cet timber weeks in 10 Ale non-parallet right of way required (114 ether scheeld better most economical for paryrow and must considered by R. ( it energy love, and least smouth of also the June the derived transmeaser . Concerned Regelie Nay Par Too little is . Encound the hall Eureeul Saura & alinds append In The state. in Sintrad an Ihm Dermest Condi (3/8. derectating and unnecessary. ( The All for indud late and environmental hazando of this power leve.

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|--|--|--|
| April 26, 1982<br>Mr. 6 Mrs. Raymond Jensen<br>9155 Miller Creek Road<br>Missoula, MT 59803<br>Dear Mr. 6 Mrs. Jensen:<br>Thank you for your detailed critique of Bonneville's<br>proposal to construct power lines to the Miller Creek area.<br>I am sending a copy of your letter to Bonneville's<br>headquarters and asking that they respond specifically to<br>each of the points you mentioned in a letter to me. I have<br>asked questions concerning some of the general problems<br>you mentioned (such as health effects) in the past, and I<br>am enclosing a copy of a Congressional Record Statement<br>containing correspondence that includes what limited<br>answers I have been able to get on these questions to date.<br>Also, I have asked the General Accounting Office to<br>fonduct an objective review of the costs involved in burying<br>the power lines as you suggest. As soon as I receive GAO's<br>report, I will make it available to everyone who expressos<br>interest.<br>Meanwhile, as you know, negotiations continue between<br>the State of Montana and Bonneville concerning the receive<br>siting Act. I strongly support Montana siting, and I will<br>continue doing all that I can to pursuade Bonneville to<br>coperate with the State and with the spirit of the court<br>decision. | 3 Bithings   | <text><text><text><text><text><text><text><text></text></text></text></text></text></text></text></text> |
| review of the problems in your area.<br>With best personal regards, I am<br>Sincerely,   | 657-6790<br>Bozeman<br>586-6104                        |  |
| Enclosure<br>cc: Peter Johnson, Administrator<br>Bonneville Power Administration   | 761-1574<br>Helena<br>449-5480<br>Missoula<br>728-2043 |  |

L-MC-3-65 L-MC-3-64

OFFICIAL FILE COPY

ANS. NC REPLY

Dave

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Action Taken

APR 14 198

Raymond o. and Allie Jensen 9155 Miller Creek Road Missoula MT 59803

April 9, 1982

To Whom It May Concern:

SUBJECT: Garrison-Spokane 500 kV Transmission Project---Miller Creek Alternative

I am writing in desperation; your help is urgently needed.

There is no reason to route the line through Missoula at all, to begin with.

BPA-preferred The route, as proposed, has impacts which must be mitigated. These are only a few:

- 1. Bald eagles inhabit and hunt the proposed route near my home; power lines are considered a hazard to eagles.
- The route crosses the Maloney Ranch. Its presence there 2. will only help to take more ag land out of production (could be a factor in forcing the entire ranch to subdivide). See map.
- The route crosses an area zoned for 220 dwellings. This 3. is horrendous enough in regard to potential helath hazards, visual impacts and property devaluation; however, it is a real heartbreaker to those of us who sweated blood for 2 years to get the developers to plan a subdivision in keeping with good land use principles. Our battle to keep the subdivision largely out of the valley floor, in order to preserve tolerable air quality in the small air shed involved, will be lost when an ugly powerline forces moving the lots back down into the valley floor, which had been set aside as a buffer zone.
- 4. Property will be devalued by the powerline's presence, without compensation. See p. 5-8, Dames and Moore Study in EiS (zerox enclosed)
- 5. Research which showed adverse health effects dealt with a distance factor of up to 1000 ft. We are extremely uncomfortable about the proximity of the route to our homes.
- Let me try to explain the difficult position in which BPA 6. proposes to place Miller Creek residents:

-We cannot, in good conscience, expose our families to what many authorities say is a hazard to health. -We cannot, in the depressed real estate market which exists, sell our homes and move. If we could expect a sale at all, it would only be at great financial loss; a loss which I, for one, am not in a position to be able to sustain.

- ₽.2.
  - 7. The route now being considered is in direct view of the Community of Lolo. The alternative we propose is not.

L-mc-3-65

L. INC - 3 - 64

- BPA's route is in direct view fo Rodeo Ranchettes subdivision. 8.
- As proposed by BPA, the line will be in direct view of the 9. largest window in my home.
- Land is taken off the tax rolls. 10.
- Act Montana State Siting is not being followed. 11. some of

These are our preferred solutions:

- 1. Compensation for off-site impacts.
- 2. Undergrounding the line where it impacts people, as presently routed, would be a compromise to consider.
- 3. BETTER: Moving the line south as indicated on Mapl, overlay b. This route involves no additional impacts and reduces the impacts on Miller Creek, Lolo and Rodeo Ranchettes. This route required undergrounding.
- **AEST:** The No Action Alternative---The EIS makes a good case 4. for this! (Sec enc.)

In regard to costs of undergrounding:

- Costs are fairly distributed among the many who benefit, 1. instead of me and my neighbors, who realize no benefits and will sustain a large financial burden if undergrounding is not accomplished.
- When spread across the rate paying base, the 8 million (if BPA figures 2. dollars per mile cost will never be noticed. are correct)
- 3. As to the matter of setting a precedent for required undergrounding in populated areas: It now seems highly unlikely that additional powerlines will be built; we point to the impending abandonment of 6 nuclear plants in the Northwest and postponement of Resource 89. It also seems like as good a time as we will see for a long time to develop this technology.

p. 3.

Additionally, we fear BPA could agree to underground, build the line up to that point, then suddenly "discover" constraints against undergrounding; then, of course, they would be "stuck with" a predetermined route.

Thank you for your attention. We in Miller Creek will appreciate anything you can do to substantially help us as time gets shorter.

Sincerely,

Raymond O. Jensen

(Taymon 1)

Allie Jensen

alla Can

RESIDENT, Miller Creek

L-mc-3-65

PRÉSIDENT, Miller Creek Landowners Assoc.

cc: Hon. Max Baucus Hon. John Melcher Rep. Pat Williams Missoula County Commissioners Peter Johnson

enc: Maps(2) ZErox (2)

P.S.: The list of impacts is in no way intended. To be complete; it is not. Nor is it to be understood That listed impacts are the most (or only) significantones. L.mc . 3 - 64 L-mc - 3 - 65

In natural settings, construction activities might impact recreational land uses such as hunting, hiking, and camping. This disruption would often be temporary, confined only to the construction period. As soon as the cables were laid and the corridor restored, recreation activities could usually resume. Hunters might find, however, that the construction work has disrupted animal habitats and that a longer time period is involved before the animals return and hunting can resume. If the cables are laid underwater, most recreational use of the water body would be disrupted only in the general vicinity of the construction and only temporarily. All permanent accessory structures would be placed on land.

The laying of an underground transmission line could alter the physical configuration of land along the route. While overhead transmission line corridors are normally built on land for which the utility obtains only an easement, an underground transmission line corridor would often be located on land owned outright. This could require a change in land ownership. The purchase of this land could change the configuration of the parcels of land along the corridor. Occasionally the purchase of a narrow corridor of land for the R-O-W could result in awkward-sized lots with diminished future use potential and reduced value. Additionally the land adjacent to above ground structures might experience declines in property value if the structure restricts the viable uses of that land either through noise, visibility or other impacts. Generally, however, such direct impacts could be mitigated. The technology is available to control off-site sound levels. Visual impacts can be reduced by landscaping the site or acquiring a larger than necessary site to buffer any impacts.

<u>Public and Private Land Use Plans</u>. A community's comprehensive development plan is its publically reviewed and adopted master plan for future development. A transmission line route which obstructs the desired development patterns would conflict with the community's goals. Most commonly, the transmission corridor is neither a positive nor a negative factor but rather a neutral one.



of maker.

The utility corridor could also conflict with private development plans if the corridor cuts across a property which is planned for development. Development plans or (more likely) R-O-W's could be adjusted to avoid conflicts. It is conceivable, however, that the corridor could preclude a private developer's project, which may or may not be seen as a negative impact by the community.

5-8

Garrison-Spokane ELS Wg2377P:02-09-82

L-mc-3-64

For the NO ACTION alternative, power transmission losses would average about 58,000 KW higher for the interconnected transmission system serving Oregon, Washington, Idaho, and Montana than for the other alternatives. The cost of replacing this energy is likely to be at least two million dollars for BPA and WMP systems. Loss savings for Montana power system would be several times this amount. As energy costs increase in the future, the value of these losses would also increase. The losses would need to be made up by adding new generation (from coal, nuclear, or renewable sources such as solar, wind, hydro, geothermal, biomass, or similar sources of energy) or by reducing energy consumption (see CONSERVATION).

Under NO ACTION, the environmental impacts associated with development of this proposal would not occur or would at least be deferred if the project were to be built at another time. Since a new/expanded 260-270 mile transmission line would not be developed, capital expenditures, materials (steel, aluminum, ceramics, and fuels), labor, and other resources (primarily forest productivity) would not be committed. Shortand long-term impacts associated with the line, the right-of-way, substation facilities, and access road system would not occur.

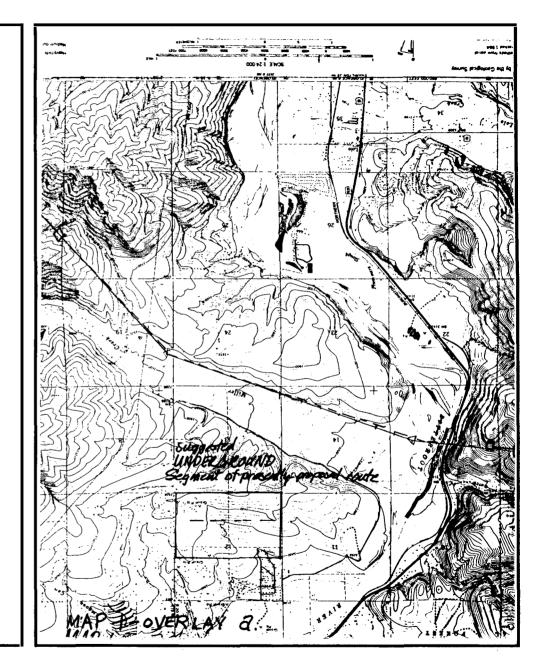
Specifically, effects on land use, social, economic, and cultural values would not occur. New transmission facilities would not be introduced near urban or residential land. Short-term construction disruption of land uses would not occur. Between 1 and 17 acres of agricultural land would not be permanently removed from production; between 2200 and 3300 acres of forest land would not be converted to transmission line right-of-way. Between 1 and 20 acres of rangeland would not be removed from use. Visual intrusion and recreational conflicts would not occur. The appearance of the study area landscape would not be altered. No conflicts with historic or archeological resources would occur. Economic losses associated with long-term farm and forest productivity would not occur. No jobs would be created by the project, nor would local expenditures and induced economic activity from the project not occur.

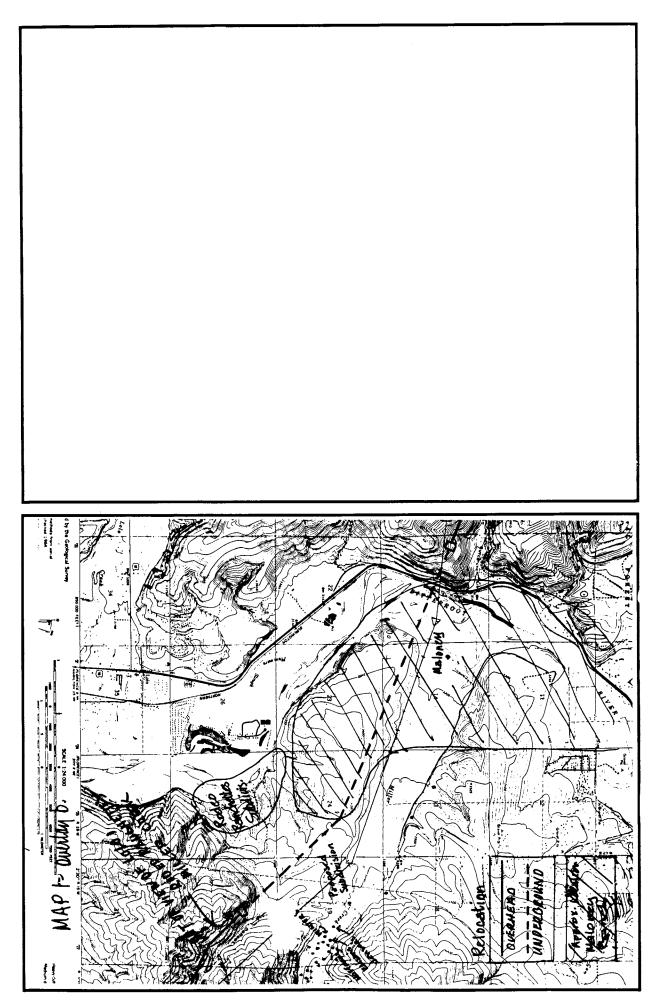
Potential disturbances of natural resources--geology, soils, water resources, vegetation, and wildife--would be avoided. Vegetation removal, soil disturbance, erosion, and sedimentation from right-of-way and access road development would not occur. Correspondingly, there would be no effect on wildlife or their babitats.

## ALTERNATIVES TO REINFORCE THE WASHINGTON WATER POWER COMPANY'S TRANSMISSION SYSTEM

The WMP alternatives depend, to some degree, upon which BPA plan is selected. Alternatives 1 and 4 could be developed independently of BPA plans. Alternatives 2 and 3 would require connection with proposed BPA facilities.

II-22





L-nic-3-64 L-MC-3-65

EN-21

Mr. & Mrs. Raymond O. Jensen 9155 Miller Greek Road Missoula, NY 59801

Dear Mr. and Mrs. Jansens

Your letter of April 9, 1982, concerning the Gerrison-Spokene 500-kV Transmission Project has been referred to me for response. The letter will be included in the comment analysis and response procedures currently underway for the draft Environmental Impact Statement (MIS). After the comment period ends (May 28), all comments will be analyses and evaluated. All comments will receive a full response in the final MIS, scheduled for completion by fall.

In the seantime, I do want to acknowledge the extent and nature of your emparts and to address them briefly. In your letter, you note memorus areas of potential impact. Mitigation for such impacts is addressed in two areas of the draft EIS: as mitigation included in the proposal and as mitigation under consideration but not adopted. Proposed mitigation for establic under consideration but not adopted. Proposed mitigation for establic under considerations includes the use of non-reflective (nonspecular) conductor and of toware treated to reduce background contrast. Mitigation not included but compilered as a potential option include such techniques as helicopter construction or undergranding a line. These are "hot included" for both technical and commonic reasons.

Some of the concerns in your area may be addressed quite simply: bald eagles in the area for instance, have been thoroughly studied, and the results of the study have been confirmed by the Fish and Wildlife Service; lend is not taken off the tax roles because EFA generally sequires an easement ever the land, not concruding of it. Other questions on health and eafsty are addressed at length in the EIS (pp. IV-17 through IV-24) and in the enclosed boaklet.

The solutions you suggest for the difficulties will also be discussed in the final BIS responses, including the potential for undergrounding the line,  $\infty$  adjusting the conterline, and We Action. We appreciate your ecoments and

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your concern over the potential effects of this transmission line project in the vicinity of your home if this route should be selected; we will work with mearby residents and property owners along the selected corridor to minimise and mitigate impacts of construction and operation of the transmission line.

Sincerely,

Isigned /

George Rekridge Project Information Officer

Inclosure

L-MS-1- 314 undated we would appreciate it if you could avoid putting your high powered transmission line in the Rattlesnake valley, Thank you. a.J. Klapevyk A. J. Klapwyk 3004 Rattlesnake Missoula, MT 59802 Garrison-Spokane NON SUBSTATION Transmission Project OT SPRINGS SUBSTATION ..... Barvenile Pos Marine Curs ( Trade to Li com ---- ×

the are against the Faft flow proposal. Joure representatives at public foreme leine un with the impression that they are a joke, set up only to mallify MA. Public input sums to be laughably and Rometimesbelligerantly dismissed . the may remaine aur Marie y rom Grun mailing list 5750 Cochise Drive Missoula, MT 59801

undated L-CL-1-31 Sì, Indertall, 3 favor l'e millerly. voute, de suma as function in your most recent plan - collect of the line the Troft par

Sandra McQuillan 두 15655 E. Mullan Rd 은 Clinton, MT 59825 는 Anited States Senate

# OFFICIAL FILE COPY No. Deve 124 MAY 9 1982 Referred To. Actor: Takin, C. ANS. Correct EXPLE By Date

April 26, 1982

Mr. Peter Johnson Administrator Bonneville Power Administration Post Office Box 3621 Portland, Oregon 97208

Dear Mr. Johnson:

JOHN MELCHER

This is to confirm my telephone discussion with you earlier today.

I have notified Max Peterson, Chief of the Forest Service of my dissatisfaction with the Environmental Impact Statement for the routing of your transmission line from Garrison west until it leaves Montana.

I wish to make the following points clear:

1. The present draft of the Environmental Impact Statement is unacceptable to me in several areas and I believe must be corrected if the line is to be approved and constructed.

2. The transmission line should be rerouted to avoid population centers and be at least one mile from residences.

3. Aesthetic values comparable to those required under the Public Lands Policy Management Act and the Forest Management Act must be adhered to under public lands and also be adhered to on any private lands that the line might impact. Specifically, I am drawing your attention to high aesthetic values concerning visable impact by private landowners.

4. Condemnation procedures on private land should not be threatened by the Bonneville Power Administration and the construction route should avoid farmland unless agreement is received from the landowner.

253 RUSSELL BIULDING CORNER OF 1ST & C NE.

WASHINGTON, D.C. 20510

(202) 224-2644

1-EW-4-60

Mr. Peter Johnson Page Two April 26, 1982

5. To avoid any of the above problems, Bonneville Power Administration should bury any portion of the line necessary to alleviate those impacts.

6. As part of the Environmental Impact Statement before it's completed, consideration should be given to routing the line from Garrison Southwest on National Forest lands toward Sula in an attempt to cross the Bitter Root Valley into Idaho, with the least amount of impact asthetically (including visual).

Please be advised that I and my staff will be pursuing all of the various alternatives that are available for the routing of this line but that the present routing and the draft Environmental Impact Statement is definitely unsatisfactory. Your consideration will be appreciated but I must emphasize that we will be needing sufficient time over the next several months to examine other alternatives.

Since the present draft Environmental Impact Statement is unsatisfactory to myself and other Montanans, I have advised the Forest Service that ending the line at Garrison and using the power elsewhere should be one of the alternatives of the final Environmental Impact Statement.

Kindest personal regards.

John Melden

## MAY 2 7 1982

CE/BPA-AE

Honorable John Melcher United States Semite Washington, D.C. 20510

Dear Senator Halaber:

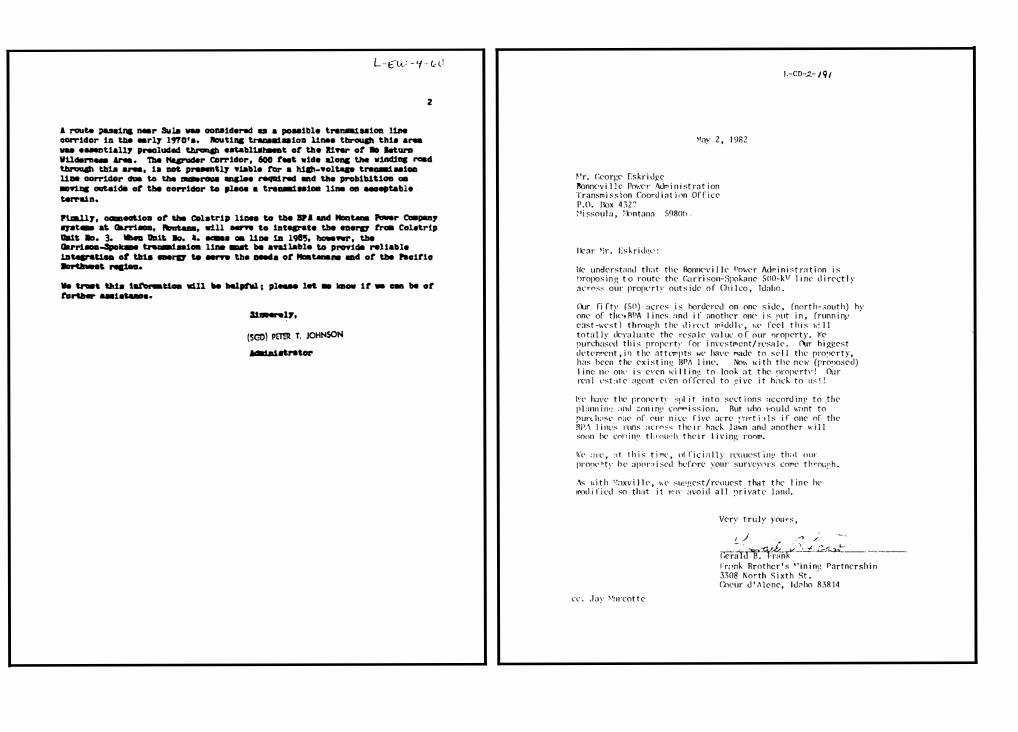
Thank you for your latter of April 26, 1982, referring to our telephone conversation of that date.

As you know, the Garrison-Spokane Environmental Impact Statement (EIS) has been released for public review. During the past few weeks, 14 public meetings have been held in Montana, Idaho, and Washington, to discuss this project. Comments received at these meetings and written comments submitted by interested parties will be fully considered and responded to in preparing the final HIS. In the meantime, I abould like to respond more directly to the accounts expressed in your letter.

The alternative routes for the proposed transmission line are located away from present human habitation for much of the length of each alternative route. Since no route can totally avoid crossing river valleys, most of which have some degree of residential development, we have not been able to define a remsonable alternative route which would pass no closer than 1 mile from all residences.

Visual concerns were a primary consideration in developing the alternative routes. A number of techniques, such as darkening towers, using non-glare conductors, limiting clearing, and adjusting tower sites where possible to keep the towers out of the immediate view of residents, have been developed to mitigate visual effects as much as possible. Undergrounding, which is technically feasible but far more costly, is considered but not proposed in the draft EIS as a potential mesure in areas of substantial esthetic concern such as the Lolo/Miller Creek and Rattlessake areas.

In appraising and negotiating for right-of-way acquisition, Bormeville Power Administration (BPA) follows Department of Justice guidelines and the requirements of Fublic Law 91-546. Although BPA makes every effort to avoid condemnation, we expect that it will be necessary to resort to the courts for acquisition of some right-of-way parcels on a project of this magnitude. Alternative routings for this project were developed to avoid farmland insofar as possible.



### L-MS-1-192

7110 Siesta Dr. Missoula, Mt. 59802

May 4, 1982

Bonneville Power Administration

### Dear Sir:

I recently discussed with Mr. the feasability of an alternate route for your power lines being run south of Alberton crossing Petty Creek and crossing I90 highway approximately 3 miles west of alberton and 500 yds. south of the East bound rest stop. I believe that the route would cross little, if any, private property and would have lesser amount of visability than any other route through that area.

If there was a slight amount of added cost, I personally think that it would be justified in the savings of legal battles alone, as well as the possibile speed in acquiring the route.

Sincerely,

# L-0M-1-193 L-0M-1-194

April 21, 1982

Er. George Eskridge Projects Information Officer BPA Transmission Coordination Office P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

We are totally opposed to the northern route because the northern route will come back across the Gold Greek Valley which consists of mostly private land. We feel the power line should be kept on Federal and State Land as much as possible. The community of Gold Greek will be living with the now proposed substation and all its ill effects, increased traffic, road maintenance and the power line itself, coming and going, without having to put up with the line crossing the valley again right at Gold Greek.

We have also been disappointed with BPA representatives and their attitude that it doesn't matter what our opinions are that BPA is going to do it their way one way or another. We do not feel BPA is being homest in their dealings with the public.

> Sincerely, atta Acitor back Course of Afacting too k Join A. Hollenback Carole K. Hollenback Box 25 Gold Greek, Mr 59733

I am a Land owner in Missoula County and I would like to express my concern about the health effects of the 500,000 uolt transmission lines proposed to be built across Missoula Gunty,

There are serious questions concerning coronal discharge, positive ion emissions, electric shock, Ozone, electro-magnetic pollution and electric smog. Which must be throughly examined. There is sufficient reason to believe these proposed power lines will cause severe health problems. No one knows how great these dangers are. We the people who will live in the shadows of these transmission lines have the right to know before these lines are built.

Clearly, we need more vesearch concerning these problems. We have been continually misled. The callous disregard for our concerns is a shocking example of indifference

to our well-being, They continue to show a Lack of concern for the will of the people, future generations, health, wildlife, Local Values, laws and regulations. On the basis of research findings, we must urge legal and safe standards for exposure and emissions of electrical radiations be established, to safeguard human life. who is going to accept the responsibility for these eventual hazards after these lines are built? It is immoral and unethical for us to be made human subjects of experimentation under these line-routes. Each day more valid information becomes available on the negative effects of these dangerous lines. We, the people of Western Montana demand protection from this apparent threat to our health. I strongly suggest that these

L-ms.1-195

L-m5-1-195 L-MS-1-196 З Lines be installed underground near Mr. George Eskridge populated aveas. To do less or to expect less is not civilized BPA P.O. Box 4327 Missoula, MT 59806 Dear Mr. Eskridge: This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 ky transmission line. Please include it in the record. James Munckler I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely Grant Creek Missoula County, Montano settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly Clark Fork Valley Prokedure Assc. Friends of the Rattlesnake serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would disturb wildlife. I want to record my strong protest regarding the fact that the BPA failed to note the visual impact of a line through the existing corridor on the entire northern vista from Missoula; failed to take account of much available research regarding the recreational use, the wildlife, plantlife, and ecology of the NRA; failed to explore the effect of a line through the NRA on aerial fire suppression; failed to give proper and sufficient weight to the impact of a line through the NRA on big game winter range, on water quality, and on high user intensity; and failed to consider sufficiently the line's impact on thousands of homes in future Grant Creek and Butler Creek subdivisions. Thank you for your consideration. Sincerely, Address: 5820 Fox Farm Road Maderess: 5820 Fox Farm Road Meiscul The goog

Flumach Fre / use

May 6, 1982

William A. Vaughan Assistant Secretary for Environmental Protection, Safety & Emergency Preparedness Bonneville Power Administration U.S. Department of Energy Washington, D.C. 20245

Dear Mr. Vaughan:

This letter constitutues BN Timberlands' Inc. (BNTI) response to the Bonneville Power Administration's proposed Garrison-Spokane 500 kV Transmission Project as presented in the Draft Environmental Impact Statement (DEIS). BNTI manages over 22,000 acres in Powell County, Montana, and over 177,000 acres in Missoula County, Montana. Each of the three proposed routes cross portions of Burlington Northern land within these counties, and consequently whichever alternative is selected, it will have a direct impact on our timber management operations.

Therefore, we cannot endorse any of the proposed routes without the BPA first addressing our management concerns. These are listed below.

A. Reduction of the Resource Land Base

Only cursory treatment is given to the fact that resource lands will be indefinitely taken out of production, resulting in the loss of future crop rotations. The text should analyze the resource trade-offs of this decision in light of national needs for timber and other resources. We suggest that the ultimate decision be made only after close examination of available factual information on resource trade-offs.

Compensation to the forest landowner as a result of reducing the resource land base is also inadequately discussed in the DELS. Payment should be based on both loss of existing timber and loss of use of the land for future timber management.

#### B. Corridor Expansion

The DEIS does not clearly display the projected maximum amount of private land to be taken out of production if the corridor is expanded. Although one of the evaluation criteria is "the ability of each plan to absorb a parallel William A. Vaughan May 6, 1982 Page two

line within the corridor," no specific or general projections are made regarding implementing this criteria.

BPA's indistinct statement that there is a "possibility of further corridor development" is inappropriate. Resource land managers need more assurance than that to properly manage resource lands on a long term basis. Our company finds it difficult to justify heavy capital investments.in reforestation or other long term forest practices when it is unknown if we will be able to harvest and recover our investment due to future restrictive land use changes.

1 11. 1 197

C. Roads

It is essential that BPA thoroughly coordinate its road standards and access plans with private resource managers prior to constructing or upgrading roads on private lands. The DEIS needs to strengthen its position on coordination so resource management options are not unreasonably impeded.

The following suggestions are specific to the DEIS and its associated documents and fall under one of the main concerns we have expressed above.

Reduction of the Resource Land Base (A)

Summary page 11 and DEIS page II-3:

 The cost of undergrounding the line on private resource lands, to mitigate resource trade-offs, should be thoroughly evaluated and clearly presented in the DEIS.

DEIS page II-6:

 The clearing operation to remove trees off of private lands needs to be coordinated with the private resource managers.

DEIS page II-11:

3) BPA should work with landowners and land managers to develop appropriate mitigation measures for affected timberlands. (Add the word "timberlands" to the first sentence, second paragraph.)

DEIS page II-13:

4) A statement is needed here to make it clear that feathering of the right-of-way is consistent with the objectives of the affected landowner. Excessive feathering in all cases should be avoided.

DEIS page II-14 & II-31:

5) The text does not adequately consider the use of longer line spans and helicopter construction to reduce proposed standards for access roads. These mitigating measures need to be fully evaluated on private resource lands along with those areas addressed in the text. L 1115.2.197

William A. Vaughan Pay 6, 1982 Page three

DEIS page IV-3:

6) In this section, the BPA should be more flexible and state that intensive forest management practices, consistent with the right-ofway, will be allowed to continue. For example, trees of a certain height limit can be grown to produce such products as stakes, posts, and poles without line interference.

DEIS page IV-12 & Appendix D pages 4-9:

7) The term "in principle," in regard to the statement on land acquisition and purchasing, needs clarification. As such, the statement does not present a firm commitment on BPA's part to fully compensate the landowner. The text should also fully explain the appraisal process BPA will use to determine compensation.

Corridor Expansion (B)

Summary page 12 and DEIS page I-1:

 The text states that parallel line location is needed for future transmission facilities. However, there is no discussion as to how this will occur, what the projected energy demands are in the future, how much land will be needed for additional right-of-way, and what other impacts expansion will have on private Iand. All of these issues should be analyzed more thoroughly.

Appendix A, Attachment 4:

 Forest management should be added to the list of land use related constraints which detract from the decision to further develop the corridor right-of-way.

Roads (C)

. Summary - Attachment C pages 1-2 & DEIS pages II-5&6:

Within these sections, the text should provide a specific road access plan to display the proposed location of tower sites, road systems, and turnouts. BPA should also add a section on its intent to coordinate the road plan with the landowner.

In conclusion, we believe the DEIS has not adequately discussed the impacts this project will have on BNTI. According to the National Environmental Policy Act, Section 1502.1, the EIS,

"...shall provide full and fair discussion of significant environmental impacts and shall inform...the public of reasonable alternatives which would avoid or minimize adverse impacts..."

In order to comply with these requirements, we believe the BPA should more fully analyze our expressed concerns and clearly portray these findings in the EIS. William A. Vaughan May 6, 1982 Page four C #15 2 - 197

We appreciate this opportunity to comment. Should you have any questions or comments on the points we have raised, do not hesitate to contact us.

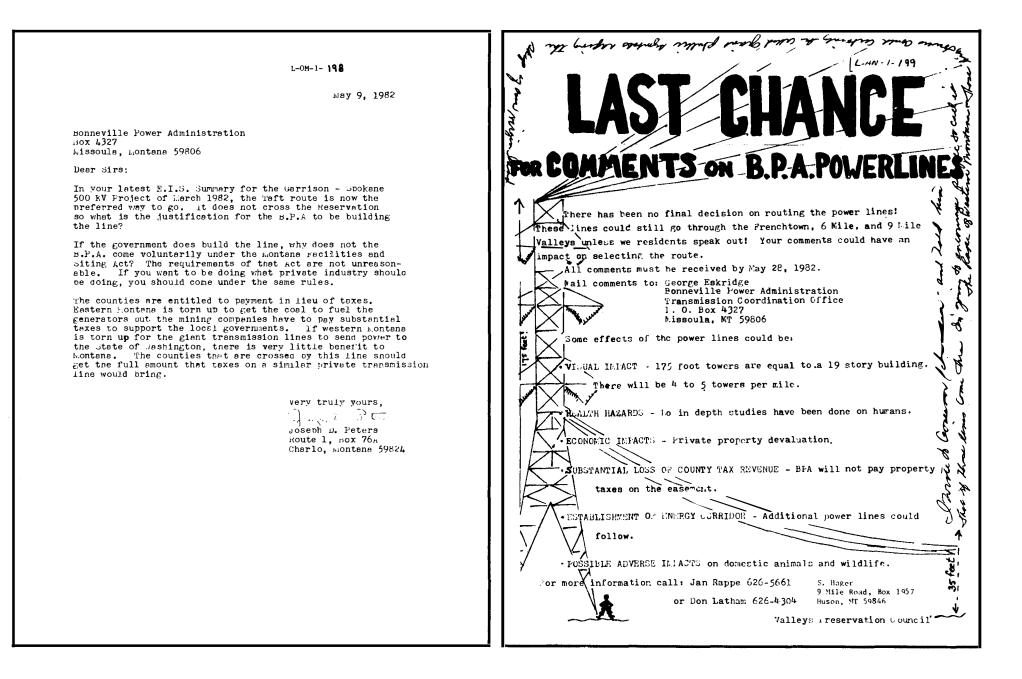
incerely,

Donald M. Nettleto

Donald M. Nettleton Assistant Vice President Timberlands

JAB/mc

cc: George Eskridge (BPA) Donald Munro (BPA)



V Montana State the de returned Ou people and your Cohorts are absolutely unconsciences That you to away with the best way Mr. George Eskridge the rail roads - with - On talking about P.O. Box 4327 Missoula, MT 59806 to an already Monsando the lass of Dear Mr. Eskridge: Maper away and a Fronal proflem adready Satablished & therefore much more acceptable. Then the record. you try to striff down our throats have, light They ever unselfe prover lesses which the one Wents, wiel undoubtably deating the commune and althere balue of countless of disturb wildlife. Valleys, etc. and make hundreds ? They unhappy maybe even distressed to the joint nentel stress or break down. Talk about uncaring ! If these thing Thank you for your consideration. go three & there is send be par in to lew Sincerely, That those responses should be forced to buy any Dughes Name : The land and line under the key power leaves Address: 6310 Woods Road Missoula, MT 59802 and formers that you keep sayin nau to and not that had a manual perflem". after all What did you proper mome to monstan for - the beautype deenery, etc. ?? We don's Grand Those Damas Thing! and We

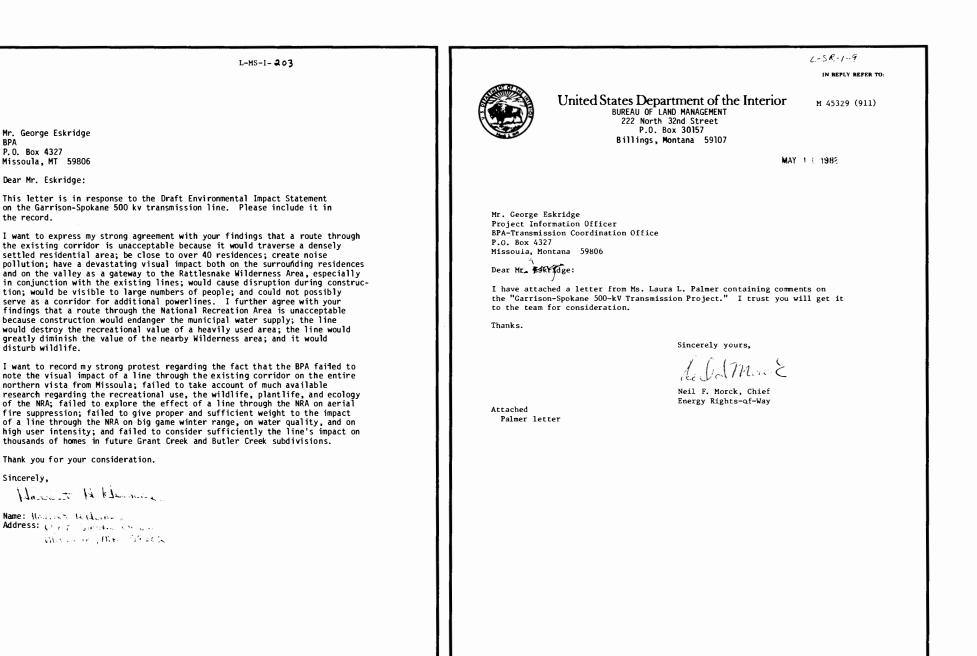
L-MS-1- 200

This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in

I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would

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Wear Me Cakridge, L-HN-1-201 Danie nerry much against the B.D.A. Remarking placed in the Drivetition, Nine mile Vallage L-MS-1-202 Concinn is the fast that health higherda Concinn is the fast that health higherda Church by this with the hermone and Anomalo is a many reach concerni Mr. George Eskridge RPA P.O. Box 4327 Missoula, MT 59806 Dear Mr. Eskridge: This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 ky transmission line. Please include it in the record. I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially Suncerely, Shocking & Election Hirrow Met. 59846 in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would disturb wildlife. I want to record my strong protest regarding the fact that the BPA failed to 9 Mile Road note the visual impact of a line through the existing corridor on the entire Huson, MT 59846 northern vista from Missoula; failed to take account of much available research regarding the recreational use, the wildlife, plantlife, and ecology of the NRA; failed to explore the effect of a line through the NRA on aerial fire suppression; failed to give proper and sufficient weight to the impact of a line through the NRA on big game winter range, on water quality, and on high user intensity; and failed to consider sufficiently the line's impact on thousands of homes in future Grant Creek and Butler Creek subdivisions. Thank you for your consideration. Sincerely, Name: Address: Life No.



BPA

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demore & Taylor I strongly unge you to consider this more southerly route which would bypass my maning claims and the town of mapielle. County alliance has proposed an alternate boits avoit three miles south of mapulie wered would. 1-001-61 I understand that knowle he mostly on public land. Sincrely, impact. and two of my six patented mining claims. This line would greatly limit the stent of future mining operations on my patented claims and would cause secure economic Battle Wushington 98102 433 Belmontle #405 500-KV Tranemission Maplet as being wery much opposed to this portion of your Taft O. Route which crosses Section 4 and Section 9 in T. 820. 7. Dear Mr. Exteridge Devision to go on record in your find Enviormental Impact This prograch Laft route corres Statement of the Clarvison - Spakane the town of Maxwille, Montana 13W. Dramte County, Nontana. may 72h 1982 Bonnewike Pauer administration Mr. Learge & Eskridge Project Information affects L-04-1-61 Muscula, Montana 59806 P.O. Bux 4327

# Missoula

L-MS-5-205

BUS. PH. 549-6172

**Rural Fire District** 2521 SOUTH AVENUE WEST MISSOULA, MONTANA 59801

May 10, 1982

George Eskridge Projects Information Officer Bonneville Power Administration P. 0. Box 4327 Missoula, Montana 59806

Dear Mr. Eskridge:

The Missoula Rural Fire District has reviewed the Draft Environmental Impact Statement for the Garrison-Spokane Transmission.

Since the three alternate routes all pass through portions of the Fire District, we have determined that this project will have a significant impact on the Fire District due to:

1. The new access roads created by this project.

2. The unauthorized use of the access roads by motorcyclists and others.

3. The introduction of workmen and construction activities into inaccessible areas.

These activities will create an additional burden on the Fire District for emergency medical, rescue and extrication activities. Presently, the two stations serving the areas crossed by the alternatives are not equipped with four-wheel drive rescue apparatus.

We feel that this project will necessitate the purchase of such apparatus and will require that the impact of such a purchase be mitigated by the Bonneville Power Administration.

Bruce Sueman-

Bruce Suenram, Fire Chief Missoula Rural Fire District

BWS:lcd



L-0W-5-206

DEPARTMENT OF THE ARMY SEATTLE DISTRICT, CORPS OF ENGINEERS P.O. BOX C-3755 SEATTLE, WASHINGTON 98124

NPSEN-PL-E R

11 1. 1982

Mr. George Eskridge Bonneville Power Administration Transmission Coordination Office Post Office Box 4327 Missoula, Montana 59806

Dear Mr. Eskridge:

We have reviewed the draft environmental impact statement for the Garrison-Spokane 500-kV Transmission Project with respect to the U.S. Army Corps of Engineers' areas of responsibility for flood control, navigation, hydropower, and regulatory functions. We have no comments.

Thank you for the opportunity to review this statement.

Sincerely,

Asst. Chief. Engineering Division



# L-EW-5-207

United States Department of the Interior OFFICE OF SURFACE MINING **Reclamation and Enforcement** BROOKS TOWERS 1020 15TH STREET DENVER, COLORADO 80202

May 7, 1982

Mr. George Eskridge Bonneville Power Administration Transmission Coordination Office P.O. Box 4327 Missoula, Montana 59806

Dear Mr. Eskridge:

The Office of Surface Mining (OSM) Western Technical Center (WIC) has reviewed the Draft EIS on the Garrison-Spokane 500-KV Transmission Project. It does not appear that there would be any significant impact nor serious conflict with this agency's responsibilities should this action be undertaken.

Thank you for the opportunity to review this statement.

Sincerely,

Allen D. Klein Administrator Western Technical Center L-0M-1-208

May 11, 1982

P.O. Box 1310 Harilton, Fortana 59840

Mr. George Eskridge 1620 Regent P.O. Box 4327 Missoula, Montana 59806

### Dear Mr. Eskridge:

I would like to express my faelings toward Bonneville Power Administration plans to built a 500kV transmission line from Garrison, Montana to Spokane, Washington. I must support the "No Action" alternative in the environmental impact statement. I feel the powerline is not needed because the demand for the electricity from Colstrip 324 is question-able. If the power is needed, existing lines and handle the increase or atleast upgraded to handle the larger load. Plus the cost of building the new line, in dollars and environmental consequences, is much greater than the benefits of building the line. Please southing the line. Action" alternative as the appropriate course to take.

If you feel you must build this powerline I feel you should adopt the Hot Springs Plan because: - it will effect less forest land

- will require less new access
- disturb less natural vegetation
- causes the least change of the appracance of the landscape.
- The differences between alternatives for recreation, wildlife and soil movement are little. No alternative will protect these areas better than applier. - lowest total cost
- Lowest transmission line morge Loss.

The major problem with this alternative is that is wi cross over private land and be visable to the public. This is why I feel this is the best alternative. Maybe this is what the public needs to get them conserved about energy and its' affect on the environment. The transmission line

L-64-1-208

## May 11, 1982

will be a continued reminder to the public of our wasteful use energy.

Also if you build the powerline please do not bury them as some people suggest. The damage to the environment is too great just to mitigate visual problems.

I sincerely hope you will choose the "No Action" alternative.

Thank you for your time.

Sincerely, Keni Sag L' Kevin Suzuki

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in the record.

I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would disturb wildlife.

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Thank you for your consideration.

Sincerely, Min March & Jahnson

Name: LAIER: E & SHIRLEY A KUNSON Address: & BEENSEEE DRIVE ANDOLN HILLS MISSOULA MOUNT SYBO21

| L-MS-1-211<br>L-MS-1-212   |  |
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| Mr. George Eskridge<br>BPA<br>P.O. Box 4327<br>Missoula, MT 59806  | Mr. George Eskridge<br>BPA<br>P.O. Box 4327  |
| Dear Mr. Eskridge;   | Missoula, MT 59806   |
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Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

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I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would disturb wildlife.

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Thank you for your consideration.

Name: Address:

Sincerely, Anali B-Tailor (M20 Dohn) H210 Ameatry Frank Microwia Microwia

L-MS-1-216

Mr. George Eskridge **BPA** P.O. Box 4327 Missoula, MT 59806

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Sincerely, Covid Lichet

Name · Address: Davie & Sichai, 2824 Highland En

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| <ul> <li>Mr. George Eskridge<br/>BPA<br/>P.O. Box 4327<br/>Missoula, MT 59806</li> <li>Dear Mr. Eskridge:</li> <li>This letter is in response to the Draft Environmental Impact Statement<br/>on the Garrison-Spokane 500 kv transmission line. Please include it in<br/>the record.</li> <li>I want to express my strong agreement with your findings that a route through<br/>the existing corridor is unacceptable because it would traverse a densely<br/>settled residential area; be close to over 40 residences; create noise<br/>pollution; have a devastating visual impact both on the surrounding residences<br/>and on the valley as a gateway to the Rattlenake Wilderness Area, especially<br/>in conjunction with the existing lines; would cause disruption during construc-<br/>tion; would be visible to large numbers of people; and could not possibly<br/>serve as a corridor for additional powerlines. I further agree with your<br/>findings: that a route through the National Recreation Area is unacceptable<br/>because construction would endanger the municipal water supply; the line<br/>would destroy the recreational value of a heavily used area; the line would<br/>greatly diminish the value of the nearby Wilderness area; and it would<br/>disturb wildlife.</li> <li>I want to record my strong protest regarding the fact that the BPA failed to<br/>note the visual impact of a line through the existing corridor on the entire<br/>northern vista from Missoula; failed to take account of much available<br/>research regarding the recreational use, the wildlife, plantlife, and ecology<br/>of the NRA; failed to explore the effect of a line through the MA on aerial<br/>fire suppression; failed to give proper and sufficient weight to the impact<br/>of a line through the NRA on big game winter range, on water quality, and on<br/>high user intensity; and failed to consider sufficiently the line's impact on<br/>thousands of homes in future Grant Creek and Butler Creek subdivisions.</li> <li>Thank you for your consideration.</li> <li>Sincerely,<br/>Mame:<br/>Address:<br/>BAG3 HighHand Dr.<br/>Aisseal A, MT SSREA</li> </ul> | <text><text><text><text><text><text><text><text></text></text></text></text></text></text></text></text> |

May 14, 1982

Mr. George Eskridge BPA P.O. Box 4327 Missoula, Mont. 59806

Dear Mr. Eskridge:

I would like to register my deep concern over the possibility of the BPA's routing any power transmission lines through the Rattlesnake Valley area.

I will not repeat here the myriad objections to such a project; certainly you are well aware of them. I am sure you already have received other letters of protest outlining ad infinitum the horrid effects such power lines would wreak on lifestyles and ecosystems in the Nattlesnake.

I will adress specifically only one major personal concern: the incredibly ruinous visual impacts of any such endeavor. The Rattlesnake already contains one power transmission line; however necessary its function, it is a visual abomination.

I oppose emphatically the routing of any more such lines through the area I live in.

Please do all in your power to ensure that no additional transmission lines are constructed anywhere near the Rattlesnake Valley.

Thank you.

Sincerely,

John Russell 1203 Dickinson Missoula, Montana 59802 L-MS-1-221

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59B06

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Mr. George Eskridge RPA P.O. Box 4327 Missoula, MT 59806

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Thank you for your consideration.

Sincerely,

Name: Address: 7115 Siest. Dr.

Misserla, MIT : 3807-

#### WILKINSON, CRAGUN & BARKER LAW OFFICES 1735 NEW YORK AVENUE, N. W WASHINGTON, D. C. 20006

(202) 783-4800

CABLE: WILCBAR

TELEX: (710) 822-9349

May 13, 1982

L-EW-3-224

| GLEN A. WILKINSON  | ROBERT W. BARKER       |
|--------------------|------------------------|
| CHARLES & HORRS    | PAUL S. OUINN          |
| LEON T. KNAUER     | RICHARD A. BAENEN      |
| JERRY C. STRAUS    | HERBERT E. MARKS       |
| PIERRE J. LAFORCE  | FRANCES L.HORN         |
| GORDON C. COFFMAN  | PATRICIA 1., BROWN     |
| STEPHEN A. BELL    | R. ANTHONY ROGERS      |
| FOSTER OF ALITZES  | JOHN M. FACCIDUA       |
| PHILIPA, NACKE     | THOMAS E. WILSON       |
| EDWARD M. FOGARTY  | ROBERT B. MCKENNA, JR  |
| JOSEPH P. MARKOSKI | STEVEN C. LANBERT      |
| WILLIAH H. TIMHE . |                        |
|                    |                        |
| JAMES E. HAGEE     | STEPHEN A. HILDEBRANDT |
| CHARLES I. APPLER  | LAUREL R. BERGOLO      |
| F.THOMAS MORAN     | CAROL L. BARBERO       |
| JACQUELYN R. I.UKE | JAMES L. CASSERLY      |
| TINOTHY C. BLOAN   | KENNETH & BATTEN       |
| SUSAN O. BERGHOEF  | GILENN P. SUGAMELI     |
| LUISA L. LANCETTI  | PAULJ. SINDERBRAND ++  |
| JAMES A. MICHAELS  |                        |
|                    |                        |

ERNEST L. WILKINSON (1899-1978) JOHN W. CRAGUN (IBO8-IB68) ANGELO A. IADA ROLA (1933-1980)

ROSEL H. HYDE COUNSEL

ANCHORAGE OFFICE BUITE 420 BOI WEST FIFTH AVENUE CHORAGE, ALASKA 89501 (807) 276-3390

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Mr. George Eskridge Bonneville Power Administration Transmission Coordination Office P.O. Box 4327 Missoula, MT 59806

Re: Draft Environmental Impact Statement --Garrison - Spokane Transmission Project

Dear Mr. Eskridge:

We are counsel to the Confederated Salish and Kootenai Tribes of the Flathead Reservation, Montana (the "Tribes"). These comments are submitted on behalf of the Tribes in conjunction with the Draft Environmental Impact Statement prepared by the Bonneville Power Administration ("Bonneville") for the Garrison - Spokane 500-kV Transmission Project, and we respectfully request that they be incorporated in the Final Environmental Impact Statement.

Selection of a transmission line route crossing the Flathead Reservation without bringing the position of the Tribes to the attention of the decision makers, in our opinion, would make the final impact statement deficient. For example, the Tribes have raised specific legal points questioning Bonneville's right to utilize the existing 230-kV right-ofway to construct the proposed double-circuit lines. The Tribes' position regarding the availability and the scope of the existing right-of-way also bears on whether the proposed Hot Springs Plan offers sufficient options for future power development. The Draft EIS, however, gives only the most cursory treatment of the Tribes' arguments. (See Draft EIS, pp. II-11, IV-46). Our letter of March 14, 1979 (set forth as L-44

L-EW 3-224

Mr. George Eskridge May 13, 1982 Page Two

in the Colstrip Project Final EIS), and a subsequent letter dated September 10, 1979, set out in detail the Tribes' opposition to the transmission lines crossing their Reservation. The Tribes will proceed to court, if necessary, to receive judicial confirmation of their rights. Moreover, we have repeatedly urged revision of the impact statements to adequately treat the issue of reliability of double-circuit construction and the effects of future upgrading of the proposed lines. A copy of these letters is attached hereto.

On the other hand, the Tribes endorse the conclusion of the impact statement that the Taft Plan is the most desirable route from an environmental perspective. The draft EIS adequately details the numerous advantages of the Taft Plan. Particularly significant is this route's maximum use of public lands rather than private or trust-held lands. No resource is of greater economic, social or historic value to the Tribes than their land. Historically, Indian land always has been taken under the guise of meeting the needs of non-Indians or "for the greater good" of all the people. Therefore, any decision to use available public lands for a public project is favored.

Furthermore, there is particular concern by tribal members regarding future development and the upgrading of the proposed lines. Bonneville's Annual Reports have noted plans to upgrade existing transmission corridors by rebuilding lower voltage lines to double-circuit 500-kV and as soon as higher voltage lines become commercially available to single-circuit ll10-kV. As indicated above, the Tribes oppose the currently proposed development as being beyond the scope of the existing easement across the Reservation and will proceed to court if necessary. It is also evident from their stated position, that the Tribes are unlikely to grant any additional rights-of-way within the Reservation. Thus, it is significant that the Hot Springs route across the Reservation has the least potential for future transmission lines, while the preferred Taft route is rated highest for future development.

Sincerely,

WILKINSON, CRAGUN & BARKER 1/ Ththom By: Richard Anthony Baenen

Enclosures

cc: Tribal Council Messrs. Houle and Pablo Ms. Evelyn Stevenson Ms. Rhonda Camel ERNEST L. WILKINSON (1899-1978) JOHN W. CRAGUN 1960-1848; GELN A. WILKINSON ROBERT W. BARKER CHARLES A. HOBBS ANGELO A. IADAROLA PAUL S. OUINN LEON T. KNAUER RICHARD A. B. BAENEN JERRY C. STRAUS MERBERT E. MARKS PIERRE J. LAFORCE FRANCES L. HORN GORDONC. COFFMAN PATRICIA L. BROWN STEPHEN R. BELL R. ANTIHOKY ROGERS FOSTER DE REITZES JOHN M. FACCIOLA PHILIP A. NACKE THOMAS E. WILSON ROSEL. H. HYDE COMMAN

> Colstrip EIS Manager Bonneville Power Administration P. O. Box 3621, Routing SH Portland, Oregon 97208

> > Re: Draft Environmental Impact Statement --Colstrip Transmission Line

ILKINSON, CRAGUN & BA KER

LAW OFFICES

1735 NEW YORK AVENUE, N. W.

WASHINGTON, D. C. 20006

(202) 833-9800

CABLE ADDRESS

WILCBAR

March 14, 1979

Dear Sir:

We represent the Contactated Salish and Kootenai Tribes of the Flathead Reservation, Montana (the "Tribes"). These comments are submitted on behalf of the Tribes in conjunction with the Draft Environmental Impact Statement prepared by Bonneville Power Administration ("Bonneville") for the proposed Colstrip Transmission line.

We respectfully request that the substance of these comments be incorporated in the final Environmental Impact Statement to reflect the position of the Tribes, which should bear on any decision made as to the location of the Colstrip Transmission line, should the same be constructed. Failure to bring the position of the Tribes to the attention of those making the decision, in our opinion, would make the final impact statement deficient. The comments raise specific legal points of importance to anyone determining what course of action to follow in making decisions as to the construction of the Colstrip Transmission lines or their location, with particular relevance to the possible decision that a portion of those lines would be constructed by Bonneville on a right-of-way received by Bonneville in 1951, for a 230 kV line, when Bonneville was an agency of the Department of the Interior.

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ALAN L RUBINSTEIN JERRY R. GOLDSTEIN EOWARD M. FOGARTY

ROBIN A. FRIEDMAN JAMES E. MAGEE ROBERT B. MCKENNA, JR. JOSEPH P. MARKOSKI

STEVEN C. LAMBERT STEPHEN A. HILDEBRANDT CHARLES & APPLER

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ROBERT A. JOHNSON

F. THOMAS MORAN CAROL L. BARBERO

JACOUELYN R.LUKE JAMES L.CASSERLY

VALERIE K. SCHURMAN BRUCE T. REESE Colstrip EIS Manager March 14, 1979 <sup>/</sup> Page Two

In reviewing the comments submitted by this letter, the following general principles must be kept in mind. The United States acts as trustee towards the lands and natural resources of the Tribes, and the proposed lines, if constructed either by the applicant or by Bonneville, would be a burden on tribal lands (as well as lands of tribal members held in trust by the United States). To so burden trust lands amounts to a taking of those lands, but no federal agency may take trust lands without specific Congressional authorization, and there has not been such authorization here except by agreement between the acquiring party and the Tribes.

L-EW-3-224

The authority of the Tribes to control the use and disposition of tribal lands is a federal policy enacted by Congress in the Indian Reorganization Act, Act of June 18, 1934, ch. 576, 48 Stat. 984, as amended, 25 U.S.C. §§ 461-479 (1970), pursuant to which the Tribes are organized. The construction of the lines across tribal land, without tribal consent, would violate this policy, and this would be equally true even if Bonneville has the requisite right-of-way (which the Tribes dispute), for the proposed use to be made today of that right-of-way would burden tribal lands in a way contemplated by neither the Tribes nor Bonneville in 1951.

Historically, Indian land always has been taken under the guise of meeting the needs of the non-Indians or "for the greater good". That precisely is the basis on which the applicant seeks Bonneville's participation here, because the applicant desires the lines, it would cost more to avoid the Reservation, and there is a need for power in the northwest. Ergo, constructing the lines across the Reservation regardless of the Tribes' position is justifiable, and what could be more appropriate and consistent than to have the federal government act for the applicant, which is precisely what is proposed. We think it is highly relevant to the decisionmaker that he be aware that the applicant is requesting the federal government to be its cat's paw in taking tribal land. It ill behooves the federal government, trustee for the Tribes, to act on behalf of five privately owned utilities, Montana Power Company, Puget Sound Power and Light Company, Portland General Electric Company, Washington Water Power Company and Pacific Power and Light Company (the "Companies"), to secure against the wishes of the wards of the United States property rights that the Companies cannot achieve themselves, and in a manner that violates the Tribes Treaty of Hell Gate, July 16, 1855, the Congressional policy framed in the Indian Reorganization Act and the pertinent federal regulations promulgated thereunder.

Colstrip EIS Manager March 14, 1979 Page Three

The history is briefly this. The Companies, in typical fashion planned and commenced construction of the Colstrip enlargement, Units # 3 and 4, without first securing a right-of-way from the Tribes, and without truly studying a way around the Reservation (see the Westinghouse Report, referred to, DEIS, p. 1.1-4, wherein an alternate route is mentioned but discarded without study. Since Westinghouse was paid by the Companies for its report, it was the agent of the Companies). The Companies obviously were of the opinion that when their investment in the Colstrip project reached a certain magnitude, and other permits and authorizations had been granted, either the Tribes would agree to the lines crossing their Reservation or the federal government would intervene.

There are three proposed routes as set forth in Figure 3.0-2 of Volume 1 of the Draft Environmental Impact Statement. The Companies' proposal would cross the Flathead Reservation for interconnection with Bonneville's substation at Hot Springs, Montana, as would one of the alternate proposals, designated "BPA Link (Hot Springs - Townsend), Segments J, K and L," Figure 3.0-2. (The proposal involving construction by Bonneville.) A third proposal, the Siegel Pass Route, would skirt the Flathead Reservation. Figure 3.0-2.

The Tribes, after initial discussion with the representatives of the Companies, informed the Companies they would not permit the lines to cross the Reservation as proposed because they would cross an area of tribal land designated as the "Jocko Primitive Area". The Jocko Primitive Area was modeled on areas established by federal law pursuant to the National Wilderness Preservation System Act, 16 U.S.C. §§ 131, et seq. Reference to that Act will show that it would be a violation of wilderness policy to construct the transmission lines in the Jocko Primitive Area. The area is set aside for future generations of tribal members, a minuscule remnant of the Tribes' once lush, unspoiled Reservation. In addition, because of the diminishing stock of wildlife on the Reservation. a natural resource preserved exclusively to the Tribes by the Treaty of Hell Gate, the Tribes were opposed generally to the lines crossing the Reservation.

The Companies, aware they could not cross tribal lands without the permission of the Tribes, then requested Bonneville to construct the lines pursuant to the authority contained in the Federal Columbia River Transmission System Act. Interestingly, the route the lines would follow if constructed by Bonneville was never proposed by the Companies to the Tribes. The L-Eu-3-224

Cclstrip EIS Manager March 14, 1979 Page Four

Companies always insisted that the lines needed to cross through or near the Jocko Primitive Area.

Bonneville has agreed to construct the lines, but has indicated it would try to reach an agreement with the Tribes, and Congress has indicated such an agreement should be reached before the lines are built.

The Tribes, however, are opposed to the lines crossing their Reservation at all under the circumstances, and will file a lawsuit if necessary.

First, the Tribes will not stand by while the Companies skirt the law by recruiting an agency of the federal government to help them out of their problems. On legal crounds, the Tribes dispute that Bonneville has the authority to expand the existing 230 kV right-of-way to one supporting twc 500 kV lines, even though the richt-of-way will not be expanded physically. The extensive change in use by adding an additional 1,000 kV's to the right-of-way puts the use of the right-of-way outside the scope of the right-of-way granted by the Tribes to Bonneville. Neither the Tribes nor Bonneville, an agency of the Department of the Interior when the right-of-way was "necotiated", comtemplated such a use. It should be noted that when the right-of-way was "negotiated" it was tainted by a form of self-dealing, since the Department of Interior was approving a right-of-way for itself across tribal trust lands which Congress had charged the Department to administer for the Indian wards.

In addition, since the right-of-way was granted in 1951, it is the Tribes' position, and the Tribes'position is concurred in by the Department of Interior, that the right-ofway will expire 50 years from that date, in the year 2001. There is, therefore, insufficient time remaining under the existing right-of-way to warrant construction of the lines on a cost-benefit ratio. The Tribes, of course, are not so naive as to think that once constructed the lines would be removed in 2001.

The Tribes also are concerned about the proposed construction of the 500 kV lines on Bonneville's right-of-way for reasons of safety. First, the right-of-way, established for a 230 kV transmission line, would support, totally, 1230 kV's. In addition, because the right-of-way is not wide enough to permit the construction of two separate 500 kV lines, as originally Colstrip EIS Manager March 14, 1979 Page Five

proposed by the applicant to the Tribes, both lines will be suspended from a single set of poles. This decision, of course, was made for legal and not technical reasons. Certainly that is not the proper basis for decisions involving the location, design and construction of 500 kV transmission lines. Obviously, running the two lines on the same set of poles increases dramatically safety problems and reduces reliability by 100 percent, for, if a pole goes down, there will be a total outage for the 500 kV lines. We also note that in the Tribes' meetings with the Companies, they were advised repeatedly by the Companies that safety and reliability required two separate sets of lines. Now, when legal impediments preclude the Companies from securing what they want, they ask the federal government to skimp on safety and reliability. Since the lines will interconnect with the Bonneville grid, reliability should be of major concern and the final Environmental Impact Statement should treat in depth this issue, and why two sets of lines are required every inch of the way except across the Flathead Reservation.

The proposed lines will have a very significant effect on the effvironment, and all would agree, we assume, that the effect would be detrimental. Certainly, if, instead of two independent lines, there can be a reduction by one, then the adverse impact on the environment would be significantly reduced. Presumably, since Bonneville proposes to utilize a "single line" by double looping, as the line crosses the Reservation, then two independent lines should not be required for the entire length of the project.

We submit, in light of this, that the Draft Environmental Impact Statement is fatally deficient because it does not investigate adeguately as an alternate a single, double looped line for the entire length of the project, as is proposed for crossing the Flathead Reservation. The draft statement, therefore, must be rewritten, in our opinion.

Finally, the area through which the lines would run is one that is intensely utilized for ranching purposes and supports a great number of permanent residents. The lines, therefore, would be located in one of the more densely settled areas of the Reservation, a factor of concern from the point of safety.

L-EW-3 -224

### L-EW-3-224

Colstrip EIS Manager March 14, 1979 Page Six

Obviously, the aesthetic objections of the Tribes to the lines are self-evident.

In summary, we consider the draft statement deficient in its failure to adequately address a single tower, double looped line construction, and in not emphasizing at the outset the Tribes position.

Sincerely,

WILKINSON, CRAGUN & BARKER thony

By: Richard Anthony Baenen

cc: Tribal Council Fred Houle . Evelyn Stevenson Richard Whitesell Sterling Munro Melwood W. Van Scoyoc D. Harwood Secretary Gerard Acting Commissioner Seneca

# WIL / NSON, CRAGUN & BARKE ERNEST L. WILKINSON (1899-1978) JOHN W. CRAGUN (1908-1969) GLEN A. WILKINSON CHARLES A. HOBBS PAUL S. OUINN RICHARD A. BAENEN RICHARD A. BAENEN JERRY C. STRAUS HERBERT E. MARKS PIERRE J. LAFORCE FRANCES L. HORN

GORDON C. COFFMAN PATRICIA L BROWN STEPHEN R. BELL FOSTER DE REITZES OHN M FACCIOLA PHILIP & NACKE THOMAS E. WILSON ROSEL H. HYDE

1735 NEW YORK AVENUE, N. W. WASHINGTON, D. C. 20006

(202) 833-9800 CABLE ADDRESS "WILCBAR" September 10, 1979

LAW OFFICES

L-ch: -3 -224

ALAN I. RUBINSTEIN JERRY R. GOLDSTEIN EDWARD M. FDGARTY ROBIN A. FRIEDMAN JAMES E MAGEE JANES E. MAGEL ROBERT B. MCKENNA, JR. JOSEPH P. NARKOSKI STEVEN C. LAMBERT STEPHEN A. HILDEBRANDT CHARLES I. APPLER BARBARA S.WOODALL TOBEY B. MARZDUK LAUREL R. BERGOLD VALERIE K. SCHURMAN F. THOMAS MORAN CAROL L. BARBERO JACOUELYN R. LUKE JAMES L. CASSERLY

HAND DELIVERED

Environmental Protection Agency Mr. William N. Hedeman 401 M Street, S.W. Washington, D.C. 20460

> Re: Final Environmental Impact Statement --Colstrip Transmission Line

Dear Mr. Hedeman:

We represent the Confederated Salish and Kootenai Tribes of the Flathead Reservation, Montana (the "Tribes"). These comments are submitted on behalf of the Tribes in conjunction with the Final Environmental Impact Statement prepared by Bonneville Power Administration ("Bonneville") for the proposed Colstrip transmission line.

In addition to the defects pointed out by our March 14, 1979 letter (set forth as L-44 in the Final EIS), Bonneville's Final Environmental Impact Statement is fatally deficient in two respects. Bonneville maintains that "[t]he reduced reliability of double circuit construction can be justified if a right-of-way is difficult to obtain and the consequences of loss of both circuits not too severe." (Final EIS, letter 44 response). This apparent sacrifice of reliability for practicality when the refusal of the Tribes to grant right-of-way across the Flathead Reservation or a variety of other factors makes parallel single circuit lines unfeasible is nowhere adequately discussed.

Mr. William N. Hedeman September 10, 1979 Page Two

Bonneville's failure to assign a value to and factor in the reliability element of its equation makes assessment of the accuracy of Bonneville's conclusions extremely difficult if not impossible. For example, how much less reliable is double v. single stack? Enough to cast into doubt the value of the whole system if even a portion is double stacked or so minimally as to suggest requiring double stacking for the entire system to reduce impact on agricultural land, commercial forest land, visual resources or other values? Exactly how much more vulnerable are double stack high towers as compared to parallel single circuit lines?

6- 570-3-224

The Final Environmental Impact Statement also fails to address the possibility of upgrading of the proposed transmission lines and the impacts extremely high voltages would inflict upon the environment. Bonneville's 1978 Annual Report notes plans to upgrade seven existing transmission corridors from 10.5 million kilovolt to about 87 million kilovolt capacity "by rebuilding existing 345 kilovolt and lower voltage lines to double-circuit 500-KV and as soon as the higher voltage lines we are now testing become commercially available to single-circuit 1110 KV." (p. 18).

The goal to develop 1110 KV lines perhaps demonstrates that if Bonneville is allowed to upgrade its 230 KV rightof-way across the Flathead Reservation, the precedent established may well set the stage for further upgrading throughout the Northwest. This potential should be addressed in the EIS.

Therefore, the Final EIS should be revised to include the effects of likely future upgrading now, before the actual construction of the lower voltage lines establishes a new base line from which further environmental effects will be arguable "minimal." Piecemeal EIS presentation minimizes and disguises environmental effects, thereby skewing the cost-benefit analysis in favor of construction. Mr. William N. dedeman September 10, 1979 Page Three L-EW-3-224

In summary, Bonneville's Final Environmental Impact Statement should be revised to take proper account of the concerns expressed in our March 14, 1979 letter as well as the inadequate treatment of the issues of reliability and future upgrading of proposed lines.

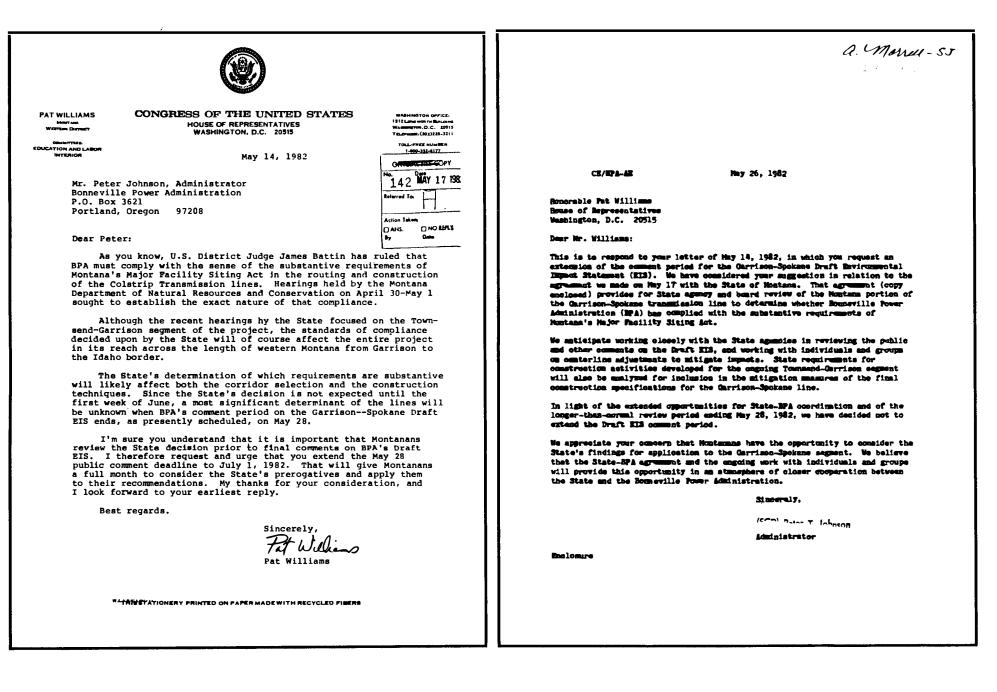
Sincerely,

WILKINSON, CRACUN &

By: Richard Anthony Baenen

cc: Tribal Council Mr. Fred Houle

- Ms. Evelyn Stevenson
- Mr. Ronald Wilkerson, BPA
- Mr. Richard Whitesell
- Mr. Melwood W. VanScovoc
- MI. MEIWOOD W. Vanscoyoc



L-MS-1-225 L-M 5-1-226

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in the record.

I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would disturb wildlife.

I want to record my strong protest regarding the fact that the BPA failed to note the visual impact of a line through the existing corridor on the entire northern vista from Missoula; failed to take account of much available research regarding the recreational use, the wildlife, plantlife, and ecology of the NRA; failed to explore the effect of a line through the NRA on aerial fire suppression; failed to give proper and sufficient weight to the impact of a line through the NRA on big game winter range, on water quality, and on high user intensity; and failed to consider sufficiently the line's impact on thousands of homes in future Grant Creek and Butler Creek subdivisions.

Thank you for your consideration.

Sincerely, Jan & Bud Marska Name:

Address:

George Eskridge Bonneville Power Administration Transmission Coordination Office P.O. Box 4327 Missoula, Mt. 59806 Susan M. Appelt P.O. Box 75 Huson, Mt. 59806

# L-HN-1-227

### 5/ 17/82

Dear Mr. Eskridge,

J am sending this letter on behalf of all I love and cherish in Montana.

These being, the majestic mountains, the tall pine trees, the peaceful valleys, the raging rivers, the priceless and irreplaceable wildlife, and not in the least, my good friends and neighbors, whom also reside, as I do, in this unique and fantastic "Rocky Mountain Paradise "

500 kilavolt twin powerlines, 175 foot tall, monsterously treading across this beautiful state, and jeoparåizing the health and welfare of all these things I love?

Scaring and destroying all the beauty which God has given us. Polluting the air with unforeseen health-hazzards, and leaving this ugliness for our decendents as their heritage?

Surely a man would have to be blind not to see how very special this part of the country is. Why ruin it for an un-necessary money-making project?

The soul of a man with greed for a heart, will surely receive his " Just Reward."

I pray these " Aerial Sewers " will never become a reality. Not only to spare myself, my family, and my neighbors from such a horrible fate, but so years from now, our generation will not be looked back on with scorn and disgust.

> In Complete disagreement With Everything these Powerlines Represent,

Susan M. Appelt

**VI-16**9

| L-HN-1- 228   | L-MS-1-148  |
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| <text><text><text><text><text><text><text><text><text></text></text></text></text></text></text></text></text></text> | L+HS-L-148         Wr. George Eskridge<br>BPA<br>Dissoula, MT 59806         Dear Mr. Eskridge:         This letter is in response to the Draft Environmental Impact Statement<br>on the Garrison-Spokane 500 kw transmission line. Please include it in<br>the record.         Jwant to express my strong agreement with your findings that a route through<br>the existing corridor is unacceptable because it would traverse a densely<br>settled residential area; be close to over 40 residences; create noise<br>polytonion in the existing corridor for additional powerlines. I further agree with your<br>findings that a route through the Rattlesnake Wilderness Area, especially<br>in would be visible to large numbers of people; and could not possibly<br>would destroy the recreational value of a heavily used area; the line<br>would destroy the recreational value of a heavily used area; the line<br>would destroy the recreational value of a heavily used area; the line<br>would destroy the recreational value of a heavily used area; the line<br>would destroy the recreational value of a heavily used area; the line would<br>disturb wildlife.         Jwant to record my strong protest regarding the fact that the BPA failed to<br>note the visual impact of a line through the existing corridor on the entire<br>morthern vista from Missoula; failed to take account of much avail able<br>reserver, the strong the top the protect of a line through the NA on aren's<br>of the MA on aren's higgene under and render sublevisitons.         Jmar to record my strong protest regarding the fact that the BPA failed to<br>the visual impact of a line through the NA on aren's<br>of the MA on aren's higgene under and render sublevisitons.         Jmar to record my strong protest regarding the fact that the BPA failed to<br>the strong the NA on the signemore under andee sublet the sublevisitons. |
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Jray, Montana 1-317 Rit 1 Bax 162 -may 18, 1982 Binneville Pawer admin. PO Box 3621 "artland. Ore 97208 (5). ias fin: Regarding the - proposed placing of in noty shil tower in our madoire opposite our poclare landow, me are det very much against it as it would abstruct the desthelie mence and reduce the property value. also it as very passible it enauld interpere liver k our televeseon reception since aue une a fringe area L'understand other praparty ou nero have abjected to these tomere and have been granted The actuard type as I hape you will Canadar -aur elles here Juncere Ly, J. W. McComick mary & De Pury

-MS-1- 231 Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806 Dear Mr. Eskridge: This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in the record. I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would disturb wildlife. I want to record my strong protest regarding the fact that the BPA failed to note the visual impact of a line through the existing corridor on the entire northern vista from Missoula; failed to take account of much available research regarding the recreational use, the wildlife, plantlife, and ecology of the NRA; failed to explore the effect of a line through the NRA on aerial fire suppression; failed to give proper and sufficient weight to the impact of a line through the NRA on big game winter range, on water quality, and on high user intensity; and failed to consider sufficiently the line's impact on thousands of homes in future Grant Creek and Butler Creek subdivisions. Thank you for your consideration. Sincerely, Henry C. Buy bec Name · Address: SIT Commell Nisconla, MT. 59801

### L-AL-1-230

May 17, 1982 Box 117 Alberton, MT 59820

George Eskridge, Projects Information Officer Bonneville Power Administration Transmission Coordination Office 1620 Regent P.O. Box 4327 Missoula, Montana 59806

Retyped from Original Letter

### Dear Sir:

Please include this letter in your file of public responses to the BPA public meetings on the Garrison-Spokane Project.

First of all, I found the EIS lacking in information directly related to the private landowners in the areas of health, land devaluation, communication problems, fire protection, and aesthetic appreciation.

I'm certain that all private landowners deserve to know how much radiation will fall from the lines, its effect on humans and other animals, and related dangers. Each landowner deserves to know the loss on land values in dollar amounts. How will the limited radio and television reception be effected? How psychologically irritating is the "humming" of the lines? As you know, both Forest Service and BPA officials warn fire fighters of entering the core area of corridors during forest fires. This information was not included in the EIS. Landowners usually buy land with a scenic view as one criterion, power lines certainly are not scenic.

\*Next, the power line should be located in the drainage between the tunnel near the Clark Fork River and the Eddy Creek as opposed to the other two alternate routes for crossing the Clark Fork River. This suggestion only pertains to the Taft Proposal if selected.

The Tank Creek area has been a very good hunting area for elk. The Taft Line Route will simply drive the elk farther into the very limited area left for wildlife. The use of existing corridors would certainly ease the pressure on wildlife habitat.

I would like to see statements in the EIS which confirm compliance with NEPA standards. Pertinent standards could be cited and the compliance measures listed.

Several Montana landowners and other taxpayers are giving up many concessions. These same people will receive little and more likely nothing in return unless the power lines cross directly over their personal property. The BPA cannot reimburse anyone else for environmental impact. Counties such as Mineral County with a seven percent (7%) tax base due to public land lose again!

#### L-AL-1-230

2

It seems as though existing corridors have already created an environmental impact. This is unfortunate but they have been developed and they do exist. Why create other corridors which will only add to the environmental impact of a beautiful area of Montana? It doesn't appear conservationally sound to keep tearing up more land when we can use what we've already torn up. Can we assume that other corridors will be studied, argued, and created in the future even though the same areas contain existing corridors?

I will end with a plea to use a presently impacted area--the existing corridor. It is there, lines are there, residents have been inconvenienced. Wildlift has moved or readjusted. The studies have been approved. Erosion has been controlled by now. BPA has acquired the land. It is simply wasteful to begin again in an area close to the existing corridor.

Sincerely yours,

/s/Wayne G. Peterson

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| L-MS-1- <b>334</b>  | L-MS-1- <b>235</b>   |
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| Draft Environmental Impact Statement<br>nsmission line. Please include it in<br>ent with your findings that a route through<br>ble because it would traverse a densely<br>to over 40 residences; create noise<br>al impact both on the surrounding residences<br>the Rattlesnake Wilderness Area, especially<br>ines; would cause disruption during construc-<br>mbers of people; and could not possibly<br>powerlines. I further agree with your<br>National Recreation Area is unacceptable<br>r the municipal water supply; the line<br>ue of a heavily used area; the line would<br>nearby Wilderness area; and it would<br>regarding the fact that the BPA failed to<br>hrough the existing corridor on the entire<br>ed to take account of much available<br>l use, the wildlife, plantlife, and ecology<br>effect of a line through the NRA on aerial<br>roper and sufficient weight to the impact<br>ame winter range, on water quality, and on<br>consider sufficiently the line's impact on<br>Creek and Butler Creek subdivisions. | <ul> <li>Mr. George Eskridge<br/>BA<br/>P.O. Box 4327<br/>Missoula, MT 59806</li> <li>Dear Mr. Eskridge:</li> <li>This letter is in response to the Draft Environmental Impact Statement<br/>on the Garrison-Spokane 500 kv transmission line. Please include it in<br/>the record.</li> <li>I want to express my strong agreement with your findings that a route through<br/>the existing corridor is unacceptable because it would traverse a densely<br/>settled residential area; be close to over 40 residences; create noise<br/>pollution; have a devastating visual impact both on the surrounding residences<br/>and on the valley as a gateway to the Rattlesnake Wilderness Area, especially<br/>conjunction with the existing lines; would cause disruption during construc-<br/>tion; would be visible to large numbers of people; and could no possibly<br/>settled residential area; be close to over 40 residences; create noise<br/>pollution; have a devasting visual of a heavily used area; the line would<br/>greatly diminish the value of the nearby Wilderness area; especially<br/>ould destroy the recreational value of a heavily used area; the line would<br/>greatly diminish the value of the nearby Wilderness area; and it would<br/>isturb wildlife.</li> <li>I want to record my strong protest regarding the fact that the BPA failed to<br/>note the visual impact of a line through the existing corridor on the entire<br/>rothern vista from Missoula; failed to take account of much available<br/>esearch regarding the recreational use, the wildlife, plantlife, and ecology<br/>of the NRA; failed to explore the effect of a line through the NRA on aerial<br/>if us suppression; failed to consider sufficient weight to the impact of<br/>a line through the NRA on big game winter range, on water quality, and on<br/>thousands of homes in future Grant Creek and Butler Creek subdivisions.</li> <li>Manter Marki failed to consider sufficiently the line; suppression;<br/>failed to explore the effect of a line through the NRA on aerial<br/>in through the NRA on big game winter range, on water quality, mand on<br/>thousands of homes in future Grant Creek and Butler Cre</li></ul> |
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**1** I

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

This letter is in response to the on the Garrison-Spokane 500 kv tra the record.

I want to express my strong agreem the existing corridor is unacceptal settled residential area; be close pollution; have a devastating visua and on the valley as a gateway to in conjunction with the existing li tion; would be visible to large nu serve as a corridor for additional findings that a route through the because construction would endange would destroy the recreational val greatly diminish the value of the disturb wildlife.

I want to record my strong protest note the visual impact of a line the northern vista from Missoula; fail research regarding the recreational of the NRA; failed to explore the fire suppression; failed to give pr of a line through the NRA on big ga high user intensity; and failed to thousands of homes in future Grant

Thank you for your consideration.

Sincerely,

Name: VS Graghty

T. E. Geraghty 1718 Traynor Drive Missoula, MT 59801

L-HN-1-236

Leo Extrudge B. A. Saxonission Cor Mila Mt - 59806

Dear Sis, J strongly object to the B.P.A pawer line running through my area - the 9-mile at Buson, Mtm fast I abject to them for anywhere - They are welly probably a health hazard, weil lower my property values - I Sust CAN't Believe They ARE EVEN NECESSARY-

Shirley Ficher Censient ad Bar 790 Ducon, Mont 59846

SKI SHOP – SKI DOO – EVINRUDE OUTBOARDS REINELL, STARCRAFT, GLASTRON BOATS **GLILL** 

L-MC-1- 237

3309 W. BROADWAY HIWAY 10 WEST PHONE 549-6169 MISSOULA, MONTANA

May 20, 1982

Geonge Eskridge 9 nojects Snformation Ufficer Bonneville Power Administration F.O. Box 4327 Piissoula, Pit.

Dear Mr. Eskridge,

S would like the following comments and recommendations to be entered into your selections of noutes for the proposed Garrison - Spokane transmission line.

Jo qualify myself, 9 am the owner of 320 acres of land at the head of Riller (reek in sections 12 and 7. 9 have lived in the location for the past fifteen years and have come to know the area very well.

At the present time, according to your maps, you have two noutes chosen. One is at the head of Hiller (neek and the other is on the north side of Hiller Teak. S understand that it is more convenient to make use of existing nous in the areas chosen, but S feel that there are several pitfalls to this thinking that should be considered on which S will elaborate.

The noute at the head of Niller (neek and along the Holloman Saddle noad is a very productive and well-managed forest land, especially from Niller (neek to the Davis point area.

Ine area of the head of Miller (reek is very scenic, las a lot of esthetic value, and is used very heavily by the residents of the Miller (reek drainage as a recreation area.

The headwaters of Filler (neek would be disturbed by your construction and leavy machinery and would affect the entire analrage. This area is very tender and should not be disturbed. St is also used by wildlife such as deer and moose for fauring grounds. Grouse also inhabit this area for nesting. Jish spawn ther and are fed into the entire length of Miller (neek.

### L- MC-1- 237

SKI SHOP -- SKI DOO --EVINRUDE OUTBOARDS REINELL, STARCRAFT, GLASTRON BOATS



3309 W. BROADWAY HIWAY 10 WEST PHONE 549-6169 MISSOULA, MONTANA

Another big concern that should be seriously considered is the heavy use of the area by niflemen and hunters. While most of them are good citizens, there are those among them that will shout at or destroy anything, which is evidenced by the buried power lines of which the riser boxes have been almost destroyed by nifle fine. This area is very accessible to town but remote in its nature, therefore, encourages this type of activity. What a better target than a huge uply power line!

For the above reasons, I would recommend that the Miller Peak route be used. Also, in talking to the land owner involved, he would cooperate with access that would be locked at all times, easing the traffic involved to your line. The noute would also have less impact on lifestyles involved and be less of an eyespre. It would cross less productive forest land and disturb less wildlife habitat.

In short, the improvement of existing roads and building of new would be far less of a headache than going the easy noute with much more exposure to vardalism and disturbance of a very tender and esthetic. area.

Respectfully, ) Robert G. Anderson Route 5 Miller (neek

#### L-HN-1-239 L-HN-1-238

May 18, 1982

George Eskridge Bonneville Power Administration Transmission Coordination Office P. 0. Box 4327 Missoula, Mt. 59806

Dear Mr. Eskridge;

Regarding the proposed BPA 500 Kv powerlines, and without alot of detailed elaboration, which we know you are aware of, you people should be made to justify a few of the more obvious serious problems of this project.

The Reagan administration is supporting "States Rights". What a contradiction to have a federal agency attempt to by-pass State laws, such as our Montana Facility Siting Act to shove a project of this magnitude down our throats, when in fact maybe the feds should let powerlines justify themselves in the free market.

NEED---folks, this should be a rather important subject. BPA's own projections show lower energy demands in years ahead than they had previously projected. Lower demand, conservation, the closing of Bunker Hill, neclear plants in Wa. state and other big users along with continued recession (and future inevitable recessions) all point to a NEED to guestion BPA's plans.

BPA has not addressed health hazards on humans. Battelle Northwest Laboratories, which is financed mostly by the Dept. of Energy, Bonneville's parent agency and by the Electric Power Research Institute, scientists have found "definate biological effects due to exposure of the electrical fields from the lines", in laboratory animals. This study is not completed and it appears due to federal budget cuts this study could be cut off this year. Now thats great. Our decision makers continue to support this project with no evident regard to other people's health, not to mention the effects to domestic animals and wild life.

The economic impacts to Montanans are staggering. BPA's draft EIS indicates an approximate \$1 million loss of county tax revenues to Missoula County alone for the first year. In Montana the low level of nonfarm earnings is 85 to 88 percent of the national figure. The Missoula economy is probably the most cyclic of Montana's urban areas, Missoula is suffering an upward 30% unemployment rate in May of "82". BPA powerlines would devaluate private properties, and all this for power Montanans aren't even using. Montana, rich in natural resources has been dunned to contribute towards our national natural resource shortage. What federal agency will be there for Montana should she collapse with financial depression? Our present state economic depression was not

L-HN-1-238 L-HN-1-239

yet known when the draft EIS was made up. It is now a very real problem. It is time to re-examine this entire project with very serious considerations given to present needs and problems. We therefore elect that "NO ACTION" is the only really sensible solution.

We are realistic and are aware that government agencies tend to unfailingly justify the need for their own projects, in general they opt for the most grandiose and expensive projects, always justifying them in the public interest, we therefore reluctantly believe the Taft route to be the least impact to people and environment, with alterations at the Ninemile to avoid threatened health and environmental hazards to the people in that valley.

Please give our first choice, that of NO ACTION your very most serious considerations when making your final decisions.

Sincerely.

Elsie M. Parker Sixmile Road Huson, Montana 59846

P.O. Box 1177 Clearlake, Ca. 95422 May 15, 1982 Mr. George E. Eskridge Project Information Officer Bonneville Power Administration P.O. Box 4327 Missoula, Montana 59806 Dear Mr. Eskridge: I wish to go on record in your final Environmental Impact whoih orosses Section 4 and Section 9 in T. 8N.; R 13W. Granite County, Montana. This proposed Taft route crosses the town of Maxville, would greatly limit the extent of future mining operations on my patented olaims and would cause severe economic impact. I understand that the Granite County Alliance has proposed would be mostly on public land. I strongly urge you to consider this more southerly route which would bypass my mining olaims and the town of Maxville.

Sincerely, Elaine M. Murphy

VI-177

L-0C-1- 240

Statement of the Garrison-Spokane 500-ky Transmission Project as being very much opposed to the portion of your Taft-C route

Montana and two of my six patented mining olaims. This line

an albermate route about three miles south of Maxville which

L-MS-3- 241

Friends of the Rattlesnake P.O. Box 7491 Missoula, MT 59807 May 10, 1982

Mr. George Eskridge BPA 1620 Regent P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

This letter is the reponse of the Board of the Friends of the Rattlesnake to your agency's Draft Environmental Impact Statement for the Garrison-Spokane 500-kv Transmission Project. Please include it in the record.

The Board of the Friends of the Rattlesnake (FOR) does not support any of the routes considered in your DEIS. By our charter and purpose, however, it is our special duty to oppose the routes that have been proposed through the Rattlesnake valley. It is the judgment of the Board of FOR that this opposition to the lines has the strongest support in point of fact and law. Some of that supporting evidence has been considered in the DEIS while other crucial evidence and legal points have been omitted. Accordingly this letter has two parts.

I. FOR's Agreement with BPA's Findings

The Board of FOR agrees with the following findings of the DEIS.

(1) The route through the existing corridor that traverses the Rattlesnake valley is unacceptable because a 500-kv line would

- a. cross a densely settled residential area and be close to over 40 residences:
- b. create noise pollution;
- c. have a devastating visual impact on its immediate vicinity and on the valley as a gateway to the Rattlesnake Wilderness Area especially in conjunction with the existing powerlines in the corridor:
- d. be visible to a large number of people;
- e. cause disruption for the residences during construction:
- not be able, even if there were no other impacts, to accommodate f. additional future high tension powerlines.

(2) The route through the Rattlesnake National Recreation Area (NRA) is unacceptable because a 500-ky line would

- a. endanger the municipal water supply through runoff and siltation from the access and maintenance roads in an area of problem soils;
- b. destroy, through it visual impact, associated road construction, and

1-115-3-241

Friends of the Rattlesnake Page 2

> disturbance of the vegetative cover, the recreational value of a heavily used area;

- c. have a strongly negative visual impact on the nearby Wilderness Area:
- d. disturb wildlife.
  - II. FOR's Disagreement with the BPA's Findings

While the case that the BPA has made against routing the powerline through the Rattlesnake valley is strong, the actual case is in fact much stronger still. This is so for three reasons: First, the BPA in some cases has not given proper and sufficient attention to issues it has addressed. Second, there are points of fact and of law that the BPA has ignored. Third and underlying much of the first two points, the BPA has ignored a great deal of available research, particularly as it pertains to the N.R.A. What follows is a detailed statement of these deficiencies.

- (1) Shortcomings in the DEIS Regarding the Existing Corridor
  - a. The DEIS failed to consider the full visual impact of a line which, crossing the Rattlesnake valley and the northern foothills of the Missoula valley, would destroy the entire northern vista from the city and be visible to tens of thousands of residences and people. This is not reflected on the Visual Alterations Corridor Impact Map.
  - b. The DEIS failed to give sufficient weight to the impact of a line on future subdivisions in the Grant Creek and Butler Creek areas. The impacts that the BPA noted for the residential areas in the Rattlesnake valley would in the future be multiplied and fall on additional thousands of people in the Grant Creek and Butler Creek vallevs.
- (2) Shortcomings in the DEIS Regarding the Rattlesnake NRA

There is much published and available research regarding the recreation. the fauna, and the flora of the N.R.A. that was called to the BPA'S attention but was ignored. References to that research is obtainable from the following persons:

Professor Charles Jonkel Department of Wildlife Biology University of Montana Missoula, MT 59812

Professor Bart O'Gara Montana Cooperative Wildlife Research Unit University of Montana Missoula, MT 59812

Professor Steve McCool School of Forestry University of Montana Missoula, MT 59812

Mr. Ken Wall Wilderness Institute School of Forestry University of Montana Missoula, MT 59812

### L-ms-3-241

Friends of the Rattlesnake Page 3

The following deficiencies in the DEIS regarding the NRA are largely, though not exclusively, due to the BPA's failure to consider and use that research. The deficiencies are the following:

- a. Though the NRA does not contain unique plant or animal species, it contains a unique collection or community of fauna and flora in close vicinity to an urban area and an academic institution. It has been used for research and teaching purposes by the University of Montana's School of Forestry and has been designated as an NRA in part for its educational value. The BPA failed to note these facts and in particular failed to include the NRA in its map of Research National/ Botanical Areas.
- b. The BPA failed to consider fully the fact that access and maintenance roads would have to be constructed on Stawberry Ridge (separating Spring Creek and Rattlesnake Creek) and that those roads would disturb critical winter range area of mule deer, elk, whitetail deer, and cougar in addition to making this area accessible to humans (p. IV-31 in the principal document; further page references are to the same source). Apart from ignoring the issue of critical winter range, the DEIS is also inconsistent in its view of roading impacts. It seems optimistic when it talks about mitigating those impacts on wildlife (p. IV-31). But when it talks about water resources, soils, and geology (pp. IV-32 and IV-33) it is candid about the severity and long duration of those impacts. The BPA's failure to consider the line's full impact on wildlife is evident also on the Wildlife Corridor Impact Map.
- c. The BPA recognizes that the powerline could impede aerial forest fire suppression. But it ignores the fact that in the NRA there is a unique combination of four factors that makes fullest aerial fire supression in the immediate vicinity of the powerline absolutely mandatory. Those factors are: 1.) High accummulation of fuels. 2.) Steep slopes. 3.) Heavy recreational use. 3.) Residences with limited escape routes in closest proximity. Evidence for the high forest fire danger and the need for aerial fire suppression comes from the fact that within the past decade there were two fires within a few hundred yards of the proposed route, both reguiring aerial suppression.

But even if "problems can be reduced to acceptable levels" (p. IV-24), which seems most unlikely, the mitigation measures ("heightening the visibility of transmission line with aerial markers") would further increase the already devastating visual impact of the line. The DEIS shows no awareness of this.

Here too, in regard to the visual impact, the DEIS is inconsistent. In one place (p. IV-36) it suggests that the impact could be lessened by avoiding access roads and using non-reflective materials. But it is clear, as said before, that heavy roading would occur and marking of lines; and the DEIS itself admits (on p. IV-30)

Friends of the Rattlesnake Page 4

L-MS 3-241

that there is only one effective mitigation measure: "Avoiding crossing over or close to intensive use areas would constitute the best mitigation."

- d. The DEIS notes that there is "intensive recreation use" in the NRA. But this is a vague and unqualified statement considering the detailed data that are available on the subject. Though comparable data for other areas may not be available, the ones available for the NRA strongly suggest that no segment of any of the proposed routes would as heavily affect recreational use as segment 114 through the NRA. This the BPA again failed to note on the Recreation Corridor Impact Map.
- e. In the discussion of impacts on water resources (p. IV-32), the DEIS fails to give appropriate consideration to the problem soils in the NRA. The Hydrology Corridor Impact Map fails to extend the area of highest impact to the entire (northern) drainages of Rattlesnake Creek and Spring Gulch Creek, both of which are important to the municipal water supply.
- f. The DEIS recognizes repeatedly (pp. III-2, IV-36, IV-85) that the impacts of a powerline would not be consistent and compatible with the legally defined purpose of the NRA, "protecting it against non-recreational development" (p. III-2). But the DEIS reasons that, since lines are not specifically prohibited by the law, such a line would probably be allowed. This conclusion is clearly in conflict with the findings of Congress as stated in the Rattlesnake NRA and Wilderness Act and with the uses that the Act is intended to preserve and to promote. FOR would be compelled to seek the protection of the courts to safeguard the intent of the Rattlesnake NRA and Wilderness Act and of the uses specified therein. Even the limited and partially flawed findings of the BPA regarding the impact of a powerline on the NRA suffice to show that the powerline's impact would be devastating to the "high value for municipal watershed, recreation, wildlife habitat, and ecological and educational purposes" which the Act is designed to protect.

We urge the BPA to consider and to incorporate in the final EIS the points that we have brought to your attention in the second part of this letter.

Thank you for your attention.

Sincerely,

Can CL'L

Cass Chinske President, FOR

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in the record.

I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would disturb wildlife.

I want to record my strong protest regarding the fact that the BPA failed to note the visual impact of a line through the existing corridor on the entire northern vista from Missoula; failed to take account of much available research regarding the recreational use, the wildlife, plantlife, and ecology of the NRA; failed to explore the effect of a line through the NRA on aerial fire suppression; failed to give proper and sufficient weight to the impact of a line through the NRA on big game winter range, on water quality, and on high user intensity; and failed to consider sufficiently the line's impact on thousands of homes in future Grant Creek and Butler Creek subdivisions.

Thank you for your consideration.

Sincerely,

Name: Straton Stephens Address: 2004 Highland Alrive Missoula, Montana 59802 L-MS-1- 243 L-MS-1- 244

Mr. George Eskridge BPA P.O. Box 4327

Missoula, MT 59806

Dear Mr. Eskridge:

This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in the record.

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Thank you for your consideration.

Sincerely,

Name: Address:

Eswin i Ethel Byrne 6155 Fillecat Rd. Missonla, Mt. 59802

L-MS-1-245 5-11-1982 B. C. SHAW APT. A-10 11CI W. GREENOUGH DR. 1. JULA MONTANA 5:80.2 6.00. E shridge-wedont new dont want- your lawgerdonenatid balong trans line, through this country - will you kindly get ant ! you have done enoy they wrong ! get kint ARMIN -

IOHN SPEILMAN Governor



L-OW-5**-246** 

DONALD W. MOOS Director

STATE OF WASHINGTON DEPARTMENT OF ECOLOGY

Mail Stop PV-11 • Olympia, Washington 98504 • (206) 459-6040

May 17, 1982

Mr. George Eskridge BPA Transmission Coordination Office 1620 Regent P.O. Box 4327 Missoula, Montana 59806

RE: "Garrison - Spokane 500 kv Transmission Project"

Dear Mr. Eskridge:

Thank you for the opportunity to comment on this project. On behalf of the State of Washington, this department has coordinated the review of the draft environmental impact statement with other state agencies, and received only the single response from the State Energy Site Evaluation Council (EFSEC). Their memorandum of response is enclosed for your information.

EFSEC has raised specific concerns about substantive standards and recent court cases involving compliance with these standards. We feel that the issues raised by EFSEC should be responded to either in the final environmental impact statement or directly to Mr. William Fitch, Executive Secretary of the Siting Council. Mr. Fitch's telephone number is (206) 459-6490.

If we can be of further help or If you have questions, please feel free to call Mr. Greg Sorlie of my staff, (206) 459-6016.

Sincerely,

John 7 Jourses John F. Spencer Deputy Director

JFS:1c

Enclosure

cc: William Fitch, EFSEC Greg Sorlie, WDOE Kevin Anderson, WDOE

| 1   | -   |   |  |
|---|---|---|--|
|   |   | L-0W-5-246  | L-0W-5-246   |
| May 7, 1<br>TO:<br>FROM:<br>SUBJECT:<br>A review<br>ing:<br>1. The D<br>The S<br>sitin<br>Submi<br>Feder<br>regul<br>2. Page<br>At th<br>gover<br>missi<br>statu<br>in a<br>these<br>an ir<br>sitir<br>3. Page<br>Elect<br>Power<br>tion<br>BPA s<br>Idaha<br>Monta<br>NESC | Kevin Anderson<br>Department of Ecology<br>William L. Fitch<br>Executive Secretary<br>Comments Regarding Draft EIS, Bo<br>Administration, "Garrison-Spokar<br>Project," issued March 1982<br>wof the above noted Draft EIS has<br>DEIS on Page xii states:<br>FACILITY SITING ACTS<br>States of Montana and Washington I<br>og of major facilities. The State<br>it to regulations of these Acts.<br>ral entity, it is prohibited from<br>lation unless Congress had specifi<br>IV-81 and IV-82 states:<br>he State level, both Washington ar<br>rning the siting of major faciliti<br>ion facilities. Federal agencies<br>utes. However, the proposed action<br>manner consistent with any substate<br>laws to the extent practicable.<br>ndex to environmental factors cons<br>ng facilities.)<br>1 and 2 Appendix B states:<br>trical code standards vary among for<br>the National Electrical Safety<br>standards are consistent with both<br>o (which has also adopted the 1977<br>ana, which has adopted the current<br>code. The 1981 edition is in no | An COUNCE<br>6490 • (SCAN) 585-6490<br>enneville Power<br>he 500 kv Transmission<br>a revealed the follow-<br>have Acts governing the<br>es hold that BPA should<br>BPA holds that, as a<br>submitting to such<br>cally authorized it.<br>Ad Montana have laws<br>es, including trans-<br>are not bound by these<br>in would be developed<br>intive standards of<br>(See Appendix B for<br>Sidered by states in<br>the states. Bonneville<br>ards upon the 1977 edi-<br>y Code. 1/ As such,<br>h the standards of<br>(NESC code) and of<br>the standards of<br>(1981) edition of the<br>case more restrictive | <ul> <li>Low 5-446</li> <li>The Washington State Codes, adopted in 1956 from the 5th edition of the NESC code, maintains somewhat more conservative estimates of necessary feet of clearance between conductor and ground than do subsequent editions of the NESC, which are reviewed based on increased knowledge and technological adares. As BPA's pracise relact meter electronic standards, they may not be consistent with this aspect of the Washington State Code.</li> <li>These three references in essence state:         <ol> <li>BPA will not comply with any Washington State Siting Standards for transmission systems.</li> <li>BPA will meet Washington State Substantive standards "to the extent practiable."</li> <li>BPA may not be consistent "with Washington State standards which are more restrictive than the Standards BPA uses for construction.</li> <li>The obvious conclusion is that BPA will not meet Washington State standards (5th edition of the National Electrical Safety Code) either substantively or actually.</li> <li>No reference is made to substantive standards relating to loc: tion, noise, construction impacts which are normally consider in siting of energy facilities. EFSEC has been more concernee with these impacts and mitigations than the NESC.</li> <li>The reason BPA must consider Substantive Standards are two con cases. In Columbia Basin Land Protection Association, etc. with Schlesinger held that:</li></ol></li></ul> |
| t nan   | the 1977 version; in some cases :   | IT 15 1655 50.  | -2-  |

L-0W-5-246

the transmission route selection process, WAC 463-42-250.

The specifically referenced WAC's are:

WAC 463-42-210 Content--Construction on site. The applicant shall describe the characteristics of the construction to occur at the proposed site including the type, size, and cost of the facility; description of major components and such information as will acquaint the Council with the significant features of the proposed project. (Order 113, subsection 463-42-210, filed 2/4/77.)

WAC 463-42-250 Content--Criteria, standards, and factors utilized to develop transmission route. The applicant shall indicate the federal, state, and industry criteria used in the energy transmission route selection and construction factors considered in developing the proposed design and shall indicate how such criteria are satisfied. (Order 113, subsection 463-42-250, filed 2/4/77.)

WAC 463-42 contains many other sections that would apply to this transmission system. This WAC has been replaced since <u>Columbia Basin vs. Schlesinger</u> by a totally amended section which conforms to SEPA. A copy of the current regulations is attached for the use of BPA to provide EFSEC with the information required to determine compliance with "Substantive Standards."

In March a Federal Court in Montana reached substantially the same findings. One point was clarified, that is, when BPA obtains a permit to cross BLM, FWS or Forest Service land they must comply with section 505 of the Federal Land Policy and Management Act for all lands they cross. In <u>Columbia Basin vs.</u> Schlesinger the court held:

The BPA's right-of-way permit is "subject to the provisions, limitations, and conditions of Title V" of FLPMA. Thus, because the permit does not add any requirements of its own, the issue is what does FLPMA obligate the BPA to do. The important section for our inquiry is subsection 505:

Each righ-of-way shall contain--(a) terms and conditions which will...(iv) require compliance with state standards for public health and safety, environmental protection, and siting, construction, operation, and maintenance of or for rights-of-way for similar purposes if those standards are more stringent than applicable Federal standards...

-3-

1-00-5-246

It is apparent to this reviewer that BPA has overlooked the Columbia Basin and Montana cases findings. In light of the fact that these court findings occurred in 1981 and 1982, it seems unlikely they were "forgotten" accidentally.

It appears that the Draft BIS is deficient in that it doesn't reference the necessity for Washington State concurrence or approval of compliance with Substantive Standards of BFSEC.

It also appears that BPA on the basis of the Draft EIS intends to make no effort to comply with the <u>Columbia Basin</u> case by providing sufficient information to EFSEC to evaluate the transmission line for compliance with Substantive Standards.

WLF:mg

Attachment

cc: Council Chairman Council Members Kevin Ryan, AAG

May 11, 1982 L-MS-1- 249 L-TF-1-247 L-TF-1-248 Alian Sira Mr. George Eskridge RPA She are writing to oppose the proposed building of the Socky transmission kine, plans Q and B. She own oppositionally To askes in P.O. Box 4327 Missoula, MT 59B06 Dear Mr. Eskridge: This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in the Eddy Deland area new Dionpoor the record. I want to express my strong agreement with your findings that a route through \$ For and alleady there and 2 500-KU lines and 3 230 KU lines the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially According through our property of this new line goes through set property you might as well buy the whole price from we and this you can pay laxes on it, will have in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would disturb wildlife. I want to record my strong protest regarding the fact that the BPA failed to Thathing here but parent lines / Car note the visual impact of a line through the existing corridor on the entire northern vista from Missoula; failed to take account of much available plopetty is all Rice offisit and the pawer line and distraying patential kinding sites for us and our chances of seeling itare research regarding the recreational use, the wildlife, plantlife, and ecology of the NRA; failed to explore the effect of a line through the NRA on aerial fire suppression; failed to give proper and sufficient weight to the impact of a line through the NRA on big game winter range, on water quality, and on high user intensity; and failed to consider sufficiently the line's impact on thousands of homes in future Grant Creek and Butler Creek subdivisions. Thank you for your consideration. Lund! Sincerely, Face Henriking Sener dy, Name: Address: 1.101 - menter and ilen & Linda Haas Bt. 2, Box 19 Monipsingtales Mil. 59873 Trile Int 59801



L-00**-5-250** 

## United States Department of the Interior OFFICE OF THE SECRETARY

PACIFIC OF THE SECRETART PACIFIC NORTHWEST REGION 500 N.E. Multnomah Street, Suite 1692, Portland, Oregon 97232 May 24, 1982

ER 82/563

George Eskridge Bonneville Power Administration Transmission Coordination Office P. O. Box 4327 Missoula, Montana 59806

Dear Mr. Eskridge:

The Department of the Interior has reviewed the Draft Environmental Impact Statement (DEIS) for the Garrison-Spokane 500-KV transmission project. The following comments are provided for your consideration when preparing the final document.

### Fish and Wildlife

The DEIS indicates that water quality could be impacted primarily through an increase in sedimentation as a result of erosion from cleared areas and traffic movement through stream channels. It also indicates that water quality may be affected by herbicide runoff into some streams. The DEIS, however, does not address the possible impacts to fishery resources which may occur as a result of these changes in water quality. The DEIS should include some assessment of what these impacts may be and the relative magnitude of them under the various alternatives. In particular, it should address impacts which may occur where the proposed line would intercept watersheds containing high value fishery resources, such as Rock Creek.

We are also concerned about the possible impacts of the proposal on riparian areas and wetlands. In riparian areas, clearing of vegetation for transmission line right-of-way and access road construction should be held to the minimum necessary. Wetlands should be avoided entirely and no transmission towers or access roads should be constructed in wetland areas. Where construction does occur adjacent to a wetland, measures should be taken to prevent construction materials from entering it.

Significant impacts to big game populations could occur where access would be provided into currently inaccessible areas which provide important habitat for big game such as winter ranges, calving areas or fall security cover. Close cooperation should be maintained with state fish and wildlife management agencies to identify where such conflicts may occur. During centerline location, important, presently inaccessible big game habitat should be avoided to the extent practicable, and where avoidance of such areas is not possible, the use of construction techniques not involving access road construction should be seriously considered. Two areas id-

### L-00-5-250

entified at this time, with regard to this concern, are the Eureka Ridge-Horseshoe Basin area east of Maxville, Montana, and the Harvey Creek-Potatoe Gulch area west of Maxville. The Eureka Ridge area is presently inaccessible and provides elk security cover in the fall. Construction in this area should stay to the north of the ridge and Horseshoe Basin if possible. In the Harvey Creek area, transmission line construction which would not require new road construction should be utilized. In particular, construction of an access road which would tie the road system in the Potatoe Gulch-Tyler Creek area in with the roads in the Harvey Creek-Eightmile Creek area is undesirable. Construction of such a road would increase hunter pressure in the area and lower its present value to elk as security cover.

We recommend that the mitigation measures included in the original EIS for the Colstrip Project, which covered a portion of the transmission line studies in the DEIS, apply to the alternatives considered in this document. This would include those measures presented in Volume I, Section 3.3, and Volume II, Appendix A3.3.3 of the Colstrip EIS. We are particularly concerned that those measures designed to protect riparian areas, wetlands, water quality, and "special" wildlife habitats be included. Finally, we recommend that in planning and carrying out mitigation measures BPA use the Fish and Wildlife Service Manual, Management of Transmission Line Right-of-Way for Fish and Wildlife.

### Recreation and Cultural Resources

It appears, on the basis of the material provided, that no existing or presently proposed units of the National Park System will be affected either directly or indirectly by the proposed action.

We are pleased to note the statement on page IV-16 regarding compliance with the National Historic Preservation Act of 1966 and all other laws and regulations protecting historic and archeologic resources. Plans include developing mitigation or avoidance measures with help from the Advisory Council on Historic Preservation and from appropriate State Historic Preservation Offices (SHPO) (page IV-16).

The plans outlined on page IV-80 state that prior to construction a survey of the selected route and substation site will be conducted by a qualified archeologist/historian to determine whether any previously known historic or archeologic sites are present and to determine the extent of known sites. It also stated that a National Register of Historic Places eligibility determination request will be made in consultation with each SHPO (Washington, Idaho and Montana).

Copies of the SHPOs' correspondence should be included in the final environmentall statement to provide supporting documentation pursuant to 36 CFR 800.

Recreation Resources. The opportunity for outdoor recreation activity is substantial in the area, with a variety of activities available. A transmission line passing near or through an existing or potential recreation area may limit land use, may affect an area's recreation designation, or may intrude visually on recreational users by affecting the unique characteristic of the area.

### 6-00-5-250

As stated on page IV-5, mitigation measures can reduce such impacts. A mitigation plan designed to minimize impacts upon affected existing and potential recreation resources should be included as part of the project.

### Wild and Scenic Rivers

The North Fork Coeur d'Alene River in Idaho and the Blackfoot River in Montana are included in the Nationwide Rivers Inventory. The inventory identifies the nation's remaining free-flowing rivers and river segments that meet the criteria for wild and scenic and recreational rivers according to the standards established under provisions of the National Wild and Scenic Rivers Act.

The Blackfoot River, crossed by Segment 113, has also been designated as a special conservation corridor due to its outstanding natural and recreation qualities. We strongly recommend that the project sponsor avoid the Blackfoot River corridor in order to prevent visual intrusion on these qualities. We also recommend that the project sponsor contact Missoula County in order to coordinate plans for the final route of the line. Missoula County has administrative responsibility for the Blackfoot River conservation corridor.

If the selected route crosses the North Fork Coeur d'Alene or the Blackfoot River, mitigation measures should be taken in order to minimize or avoid visual intrusion upon these river areas.

Segments 139 and 142 pass in close proximity to the boundaries of the Lolo Trail National Historic Landmark, and Segment 5 passes near Glacial Lake Missoula National Natural Landmark. These sites have been designated for their outstanding historic or natural qualities. Although no statutory protection has been given to these areas, every effort should be made to avoid any adverse impacts. If the final route of the transission line includes these segments, we recommend that visual impacts to these areas be reduced as much as possible.

The proposed routes shown in Figure 4.1 indicate that the transmission line will have varying degrees of impact on a number of areas which have received assistance from the L&WCF. A list of these areas follows this discussion. In some cases, the impact will be only visual, but it appears that certain of these areas lie directly on the proposed routes of the transmission line. Should any of these areas be crossed by the line, the project sponsor would be required to comply with the provisions of Section 6(f) of the L&WCF Act, as amended. This section of the Act requires that any change from outdoor recreation use be approved by the Secretary of the Interior and requires the substitution of other properties of at least fair market value and reasonably equivalent usefulness and location for the recreation land to be taken. Precedents have been established which make transmission line crossings subject to Section 6(f).

Any request for a change in land use under Section 6(f) in Montana or Idaho must be made through Mr. Ron G. Holliday, Administrator, Parks Divison, Montana Department of Fish, Wildlife and Parks, 1420 E. 6th Avenue, Helena, Montana 59601 or Dale R. Christiansen, Director, Idaho Department of Parks and Recreation, Statehouse, Boise, Idaho 83720. However, we recommend that every effort be made to avoid crossing these areas and, wherever possible, to minimize or avoid visual impacts.

### LAND AND WATER CONSERVATION FUND AREAS

Garrison-Spokane 400-kV Transmission Project

| County, State | Area                            | Segment     |
|---------------|---------------------------------|-------------|
| Granite, MT   | Medicine Tree Fishing Access    | 119, 121    |
| Missoula, MT  | Beavertail Hill                 | 121         |
| Missoula, MT  | Bud King Fishing Access         | 4, 149      |
| Missoula, MT  | Frenchtown Pond State Rec. Area | 125         |
| Missoula, MT  | Petty Creek Fishing Access      | 145,146,147 |
| Missoula, MT  | Turah Fishing Access            | 125         |
| Sanders, MT   | Ruenauver Park                  | 18          |
| Sanders, MT   | Thompson Falls Golf Course      | 29          |
| Sanders, MT   | Thompson Falls State Park       | 22          |
| Sanders, MT   | Thompson Falls Recreation Area  | 18          |
| Shoshone, ID  | Shoshone County Park            | 31          |
| Shoshone, ID  | Kellogg City Park               | 31          |
| Shoshone, ID  | Osburn Playground               | 28, 31      |
| Shoshone, ID  | Wallace City Park               | 25, 28, 31  |
|               |                                 |             |

Thank you for the opportunity to review and comment on this document.

Sincerely,

liailer 3 Charles S. Polityka Regional Enviromental Officer

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in the record.

I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would disturb wildlife.

I want to record my strong protest regarding the fact that the BPA failed to note the visual impact of a line through the existing corridor on the entire northern vista from Missoula; failed to take account of much available research regarding the recreational use, the wildlife, plantlife, and ecology of the NRA; failed to explore the effect of a line through the NRA on aerial fire suppression; failed to give proper and sufficient weight to the impact of a line through the NRA on big game winter range, on water quality, and on high user intensity; and failed to cersider sufficiently the line's impact on thousands of homes in future Grant Creek and Butler Creek subdivisions.

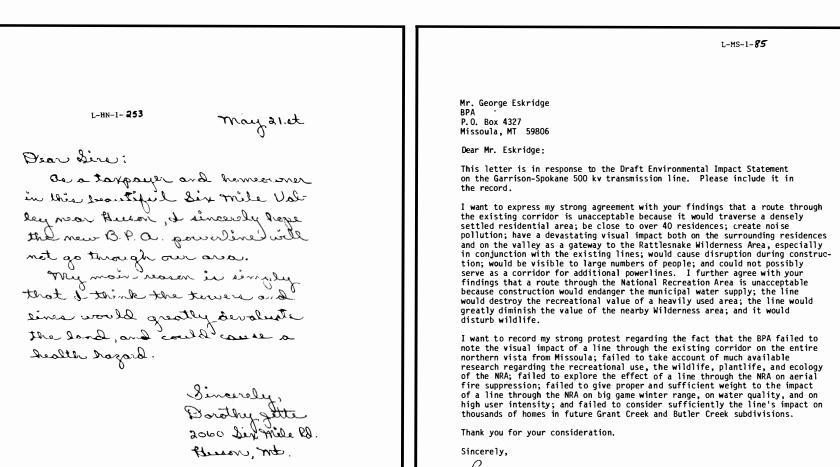
Thank you for your consideration.

Sincerely,

Shil tandorp

Name: Phillip R. Fandense Address: 1605 Jackson

Allin Hodge RF 6 Mile Road, Box 315 Holion, MT 59846 May 19, 1982 Deanye Est, idy.e. Banneville Bower administration hammission Coordination office (J.O.Bey 43.27 Missoula, mon 59806 bearma Estudge you have set a dealtine of may 28th for connert on the B.P. A Power line. Here are a few comments & question. which I wish you would Slean answer for me the times of hand times a good scone of the times of the United States why in the hell in the U.S. Government having The towers and cable from the fagure When you preach buy American Now with as many Beople but of work an they also going to sig in but Back, to do the work at minime on helow wages a land of the free + a man home is his castle , The fore so the fore of the low Where the her they will Pites a Bowen line whether he like tan not. Don't you things are a bit out of hand! He back to the drawing board + One up with something better we can accept. 35 minutes like Stricently folge RR6 mile RI



Kay Kirlin Name: RAY LANFERR Address: 327 Sigting of WEST

HISSOUIA, NI 59801

| L-AL-1-254  | L-MS-1- <b>256</b>   |
|---|--|
| L-AL-1-255  | L-MS-1- <b>257</b>   |
| 29, 1989<br>Choppen Valeniane<br>merille Perien Mainistration<br>menission Co-ordination Office<br>. Nor A127<br>molta, W. 59806<br>n Br. Askridge:<br>ald the BPA Powerlines he built? Foll<br>1. Our County will suffer a substantial loss of County<br>Pix Revenue. Mineral County suffers enough now!!<br>2. Not enough study has been done on the Powerlines in<br>relation to animals and wildlife. AND what about<br>humans??<br>Non't think these Powerlines are needed and don't want 175 ft.<br>percly,<br>Court Mark County Suffers and mountains!!<br>mercly,<br>Court Mark Leaver<br>in and Sondy Leaver.<br>Nor 157<br>when, MP 59820 | <ul> <li>Mr. George Eskridge<br/>BA</li> <li>P.O. Box 4327</li> <li>Missoula, MT 55806</li> <li>Dear Mr. Eskridge:</li> <li>This letter is in response to the Draft Environmental Impact Statement<br/>on the Garrison-Spokane 500 kv transmission line: Please include it in<br/>the record.</li> <li>I want to express my strong agreement with your findings that a route through<br/>the existing corridor is unacceptable because it would traverse a densely<br/>settled residential area; be close to over 40 residences; create noise<br/>pollution; have a devastating visual impact both on the surrounding residence<br/>and on the valley as a gateway to the Rattlesnake Wilderness Area, especially<br/>in conjunction with the existing lines; would cause disruption during constru-<br/>tion; would be visible to large numbers of people; and could not possibly<br/>serve as a corridor for additional powerlines. I further agree with your<br/>findings that a route through the National Recreation Area is unacceptable<br/>because construction would endanger the municipal water supply; the line<br/>would destroy the recreational value of a heavily used area; the line would<br/>greatly diminish the value of the nearby Wilderness area; and it would<br/>disturb wildlife.</li> <li>I want to record my strong protest regarding the fact that the BPA failed to<br/>note the visual impact of a line through the existing corridor on the entire<br/>northern vista from Missoula; failed to take account of much available<br/>research regarding the recreational use, the wildlife, plantlife, and ecology<br/>of the NRA; failed to explore the effect of a line through the NRA on areail<br/>fire suppression; failed to give proper and sufficient weight to the impact<br/>of a line through the NRA on big game winter range, on water quality, and on<br/>high user intensity; and failed to consider sufficiently the line's impact on<br/>thousands of homes in future Grant Creek and Butler Creek subdivisions.</li> <li>Thank you for your consideration.</li> <li>Sincerely.<br/>Mark Strow F. J. Nerma K. Straven<br/>Address: Mice Fex Fairwit Re.</li> </ul> |

May 20, 1982 Page 1

This letter is in response to the draft E.I.S. prepared by the Bonneville Power Administration. After reading and studying this report I am not fully convinced the B.P.A. has shown that the Taft route or any route through the Missoula valley is a good choice environmentally. Alot of the reasons presented for prefering one route over the other are matters of opinion rather than proof.

The abstract in the E.I.S. describes the powerline as creating visual impacts especially noticeable near recreational and residential areas. Cultural resources may be affected. It would remove vegetation, increase erosion, and change wildlife hebitat. along much of the right of way. Collision hazards would increase for waterfowl and birds of prey and fishery resources may be affected to a slight degree where the line crosses stremms. This is a high price to pay for a powerline that may not be needed.

Seed for the project is addressed only briefly. Yet it has been almost seven years since the Colstrip E.I.S. was prepared. The need for power has changed substantially since then. The W.P.P.S.S. nuclear plants were terminoted because the need wasn't there. Alot of big users have completely closed their doors. Why build these powerlines now if they aren't needed? Fore time should be taken to study the need before irreversible damage is done to the environment. For the final E.I.S. to satisfy the needs of the public interest the need for the powerline should be addressed thouroughly. This study should be done by an agency other than the E.P.A..

Congress requires the Northwest Power Planning Council to draft a plan that before all else provides the most cost efficient energy. The council first just look at conservation and renewable energy sources such as solar, hydro, wind and biomass. Traditional sources like coal and nuclear are supposed to be considered list. Conservation doesn't cause acid rain. Only a small amount of locil people would be dired for a short time to work on the powerline. With the conservation and renewable energy options more local people would be employed and the effects on the economy would be longer lasting. L-M5-1-115 Page 2

Comparing the idvantages and disadvantages listed in the E.I.S. summery of the no-action option the advantages far outweigh the disidvantages for Eontana residents. The advantages listed are environmental while the disadvantages of no-action are economic. The economic disadvantages could be sade up in other ways such as energy conservation and using renewable energy sources. The saving of steal, aluminum, coramics, fuel, agricultural land, our upber and residential environment, forest lands, range lands, recreation areas, and natural resources is very important to be.

The health effects of the powerline are not addressed thorou hly in the draft E.I.S. Since the E.I.S. has been released I have heard of studies showing possible links with train concer, severe depression, suicide, abnormal effects on animal nervous systems and a possible link with with defects. I am referring in part to the work done by Larry Anderson at Battelle Northwest Labor tories in Richland Washington. This study should be included in the final E.I.S. along with others showing detrimental effects. This is a high price to pay for something we don't need, to survive.

If the B.P.A. is allowed to build these lines, the economic cost will be two-fold. Higher property taxes due to lost revenue and higher utility costs when the power is sent back to us from the west coast. If the Taft route is chosen our utility rates would also be higher since it has the second highest cost and would have the highest transmission losses.

Fost counties through which alternative segments pass have adopted some form of land use plans. All the plans state that undeveloped landscapes are to be protected in order to mointain environmental quality and preserve existing rural atmospheres. This goal is not being accomplished by choosing a preferred coste that goes through an area where there is virtually no existing powerlines or exements.

The E.I.S. summer ry lists on page 3 the reasons why the Taft route is environmentally preferred. Nost of these reasons are only a matter of opinion. These six reasons are not proved to deter-(1) Least social implicit.(2) best avoids developed and developing urban and residential areas (although it crosses through two developing subdivisions), (3) avoids environmentally sensitive.

areas. This is addressed in appendix A IV:11. Miller Creek and Blue mountain should be listed separately and South Missoula should be added to the chart.,(4) would affect Fewer recreationists on a year round basis, (5) fewest river crossings, it minimizes the impacts on wild life and avoids affecting the bald eagle, and (6) minimizes visual impacts. The number of people living in an area doesn't reflect on the number of people who use it or view it. If these reasons are going to be included I would like to see some accurate counts of people using, viewing, and living on each route. I would also like to see proof that one area is more abundant in wildlife and eagles than another area. The other reasons listed are easier to prove (1) crosses least a ount of agricultural land, and (2) minimizes impact on archeologic and historic resources.

That "the Toft route is the best option for future percelled lines, should they to necessary by avoiding serious problem areas clready constrained by geology, geography and previous development" seems to be the most important reason. Thirty-nine years from now the Toft route will be developed along as is the dot Springs route through the Rattlesnake, if current trends hold their course in Eiseould development. Paralleling the Poft route will be met with the same resistance or paralleling the 230kv line on the Hot Springs route where there is an easement. I see one of two things happening then (1) an attempt to build on the easement held by the B.P.A. for the Hot Springs route or (2) another area of forests, watersheds, and communities will be affected with a powerline and its herbicides.

The Taft plan ranks last for impacts on forestry, venetation, and water resources as it encounters fore heavily timbered land, more highly productive forests and longer stretches of watershed serving devisions communities than either the flot Springs or Plains routes. Our forests and water supply are a very informant part of our environment. The forest land under the lines will be permanently taken out of production.

Regarding Table 2.3 Comparison of alteractives devices entitle Ranking Scamary.

(1) The Caft Plan doesn't avoid residential and inhubited areas any more than the other two routes.

(2) Finimizing disruption of peoples lives ad life styles

# L-MS-1-115 Page 4

is not proven in the 2.1.8. There may be fewer people living in one free the site other, but that doesn't represent the number of people that use the free or can see the line from their homes or favorite recreation spot.

(3) Dinimizes adverseeffects on scenic tree and estattic values. Since there are no large power lines along the Taft route the esthetic qualities would be greatly disturbed.

(4) Avoids environmentally sensitive areas. This cannot be proven. The forests and rivers are environmentally sensitive to me not the area along the freeways and alloways.

By using the forests for the powerline their will be a creater impact on wildlife and vegetation. There are bald eagles, peregrime follows, and possibly drey wolves along the Taft route which are endangered or threatened. If we continue to disturb the habitat of the colden eagle, blue heron, ducks, corotes, fox, mountain lion, dear, elk, moose and bear they may soon be eadengered. Futting a powerline through an area where there aren't any containly does not nelp. Since we have powerlines, freeways and reilrowd tracks in the velleys, we should try to save the estnetic values of the forests. (All viidlife mentioned above have been seen on Taft route.)

The description of the Taft bloch in Section II pages 18-19 is lacking. It is stated that less people blong the route use the area for recreation yet there is no proof. Rock Greek and Goeur d'Alene River are contioned as for as recreation, but there are beny othere areas such as tiller Greek, flue count in, Rine sile, and Deep Greek only to nome a few. The only area testioned for bald ed les is the orea north of St Recis yet the sep in Appendix C shows bald edgles in the Rock Greek and bitterroot river orea. It is stated that no other endagered species is encountered yet the percenter falcon is shown in the Rock Greek and directile area. It is closestated that no simificant big game imports would occur, but there is no evidence supporting this. I would like to see a study done on the effects lar e powerlines have on big game, preferably by another atency.

On pase 19 of Section 11 the B.P.A states more clearing for access roads would be required by routing upslope and out of the valleys for the Taft route than the other two-routes. Table 2.1

#### Page 5 L-MS-1-115

Comparison of Alternatives Technical Considerations shows 33.5 miles of existing right of way is followed in the Taft plan, yet 109.2 low access requirement miles is shown. This is in error since the description for low access miles is "Generally parallel to existing utility rights-of-way with access roads that could be used. Possible some upgrading and new tower sour roads would be required."

B.P.A. policy is to use existing corridors wherever possible. Creation of a new transmission corridor can have more intense impacts on natural resources and land uses than parallel construction. Yet the preferred route chosen follows the least amount of existing corridor. Both the Hot Springs and Plains plans utilize existing right-of-ways and parallel other lines which would minimize disturbance of any more lands. The Taft plan follows the least amount of existing right-of-way and parallels none.

In Section II page 31 moving segment 142 further south is discussed. This might reduce the impact a small amount for one part of the population but would increase the impact on another portion. If this is considered hearings should be held to allow public comment.

In Section IV page 35 the B.P.A. has stated that the additional lines would not match the existing lines as to size. configuration. or spacing, giving the right-of-way a chaotic appearance in the narrow Rattlesnake valley. It doesn't make sense to justify not following an already established powerline route on the grounds that the size of the powerlines don't match. Instead the B.P.A. proposes to cut a swath through an area that is essentially undisturbed by powerlines. Comparing a powerline to a forest is even more chaotic.

In Section IV page 37 Social and Economic Considerations the B.P.A. states construction and presence of the line in the Missoula Rattlesnake area would also increase alienation of the public, as the line could pass through a moderate/upper income subdivision. The income of the people should not reflect on a route choice. This adds to my belief that the B.P.A. is not making their choice on environmental reasons but political reasons.

### Page 6 L-MS-1-115

The powerline should be considered as a whole not in sequents. If the Towasend-Gerrison route is approved, the only options left are one of the routes through wissoula. These may not be the best alternatives that could be comsidered. An east-west corridor should also be considered as an alternative rather than a route through one of the largest cities in western Montana.

In summary, issues I would like to see addressed in the final E.I.S. are:

(1) Seed for the project should be addressed extensively. This should be done by an unbiased agency.

(2) More study should be done on the health effects of the line. (3)Mostane Power should be responsible for the construction of the powerlite not the B.P.A.

(4) Recreation counts should be taken to see which area is used the most.

(5) Wildlife counts should be taken.

(6) More emphasis should be placed on protecting the views in the mountains rather than along the freeways, railroad tracks, and powerlines.

(7)Game management areas and municipal watersheds should be rated high for impacts since herbicides are used under the powerline.

(8) The growth of Missoulz toward the south should be considered as an important factor, when discussing urban residential impacts.

(9) Powerline should be considered as a whole, not in segments. Home owners along the Taft route would be very clienated by the

powerline, since we chose to buy our property where there was no existing powerline right-of-way.

Janet Rice

Janet Rice 4350 Trails End Road Missoula, Montana 59806

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in the record.

I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruction during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unaccentable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would disturb wildlife.

I want to record my strong protest regarding the fact that the BPA failed to note the visual impact of a line through the existing corridor on the entire northern vista from Missoula; failed to take account of much available research regarding the recreational use, the wildlife, plantlife, and ecology of the NRA; failed to explore the effect of a line through the NRA on aerial fire suppression; failed to give proper and sufficient weight to the impact of a line through the NRA on big game winter range, on water quality, and on high user intensity; and failed to consider sufficiently the line's impact on thousands of homes in future Grant Creek and Butler Creek subdivisions.

Thank you for your consideration.

Sincerely,

Name: 1347 & 357 n. Abn Address: 4717 Allow Strandow MT Start 1-MS-1-326

Missoura, Morama A MAY 25, 1982

MA. GEDRGE ESKRINGE B.P.A P.O. BOX 4327 MISSOULA MEDITALA 598.06

DEAN MA ESKRIAGE

I AM WRITHIG THIS LETTER TO EXPLASS MY CONCURRANCE WITH THE FAIDLANDS OF THE PART E. J. S. FOR THE RICH SADALSMI. SPORTANE POWED LINES. THE AF IS SE PUESTONI THAT THE RONTE OF THE EXISTING CONDITION IS IDIALLY UN ACCEPTITISLE FAME ANDALY PRESONS, DOINTARY ANOUSE THESE ARE THE NAMING DETRIASENTAL IM PARTS DRI THE PISIONS OF THE AREA AND THE POTENTIAL HARMAN TO THE NAMINAL REPRESENTAL ANDER

WHILE I CANNOT TRULY STORMAT ANY OF THE PROPOSED AND EN LINE DONTES, AND BELLEVE THE ARAFT ENDS. JO BE INSUFFICIENT ON MANY POLNIS, I MOST ATREE THAT THE RONTE THANKS THE RANTESTAKE PAULEY IS THE WOAST POSSIBLE CLASSES AND WOULD MOST STRONGLY PROSEST SMOKED IT BE IMPORTANCE

Six Malaly

Volex MI Cless

Mill Low SAFTADAUCH Mills Source Monthan 175102

-June 24th 1982 L-HN-1-327 L-HN-1-328 George Echarlys In going our the map of the prepased 3, P. D. power line route in ful chat the tagt route mound be it best may to go. after giving special Laught to all it small town along the way to product them from loss of property Value. Z. Visual and Alasse effect it gaing to have and setas it mall de to an unich legi Chase of me have & have the Dut it where it will do the bast damage and protect us inthe anajed Valleys of any State where so many pupe have made des home Mart Mus William Courses Boy 176- 6 mile road Kuson, Most 59846

L-MS-1-329 May 24, 1982 Mr. George Eskridge BPA PO Box 4327 Missoula, MT 59806 Dear Mr. Eskridge: This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in the record. I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences and would be visible to large numbers of people. I don't agree with your findings that a route through the National Recreation Area is unacceptable. I don't believe construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; or that it would significantly disturb wildlife. However, I want to express my concern regarding the BPA's apparent failure to note the visual impact of a line through the existing corridor on the entire northern vista from Missoula; and failed to consider sufficiently the line's impact on thousands of homes in future Grant Creek and Butler Creek subdivisions. Thank you for your consideration. Sincerely, Robert J. Kelly 1330 Sunflower Drive Missoula, MT 59801

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

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Thank you for your consideration.

Sincerely,

Name: Ellen E. Kinonen Address: 1101 W. Greenough Dr. E-6 Missoula, Mt. 59802

# L-SR-1- 42

# May 23,1982

Subject: Dieft Els Er Gurrison-Spekane 500 ku Trinmusion Project Public Comment

Dear Sirs;

I have received and revenued your DEIS on the above preject. There found your analysis to be misleading, contradictory, skinted, and totally inadejunte. You have totally lost sight of your objective by submurging your elves in bueracrutic process and artificial justification. Power demand and need for this project have greatly diminished in the last few yours as is evidenced by closure of Bunkarthald in Idaha and WWPS termination of construction or nuclear power plants in Washington, your chim to reinferic the power grid is inane and unjustifiable in this case it increasing conservation by the public and associated decreases in demand No where in your DEIS do you prove that any need exists. You have become so wrapped up in Forcing this twin 500 KV line down the throats of a resisting public that you have lost sight of the original objective. By excluding the public in the scoping process, you have clearly proven the BPA to be the most innespirave and short signified agency operating today. Vern documentation tails to address any realistic insideration of environmental impacts or impacts to people altono, the line and the speneral rate payers. your insistence on continuing in the light of overall public. opposition is disjusting. In your attempt to explimin your process and rationale to the public, you have only succeeded in confusing all readers with untractruble contradictions and doite which for a can only be circurcitely described as lies. You have completely excluded one must important consideration

the circle on the grand clearly demonstrates that crossing the cutality read (they 1353) he wind (E-NE) # Tanua Hill to be beth less visible and crossing less private. The startsughtedress or BHA is further demonstrated point was the public consulted firs designing this suite. money and environment by selection of the existing Hot Springs revie to save mensay and convincement. If you wast on continuing, you should go that to the beginning and work with the public, and not against the public, apposition to this proposed line and mute which have pay the true proving plumad prograd threader in a domesized withing BPA to scrap the project will some force (and money) It is three true BPA start astrony listening to the public and not which major densions indeeding milling to our these papers when in fulls signed it to mand R/W twongh that Springs I mule this demand is a and had the prachaal knowning at the tennency regulation the pregressing or local concerns. The highly had the second concerns the highly remained at the cutally cards are significant of the cutally and a stranged to the second concerns the secon of people behind closed don's Tween major public in the speake proting of the sections alternative. At no member of the public who will ultimately be hard to unuedintaly contenned by 13 PM engines who had read bear out on the gran of cicross privete landard himes when and bok at or at least have the common serve to select the L-SR-1-42 Minered County were the buse. both iend. The word "environment" suggests consideration, of such nothing resumes is truber wildlife, scenic quality, and scals. This torte in fact has the greatest environments by pur isviated decision makers. The selection of what you and the surther fasts as the "envernmentally preferred" alternative is dissipating To cull this rate environmentally preferred is another the. impact. It is an un-permercined rante through raygest and steep and trackly vegetated wildland. The proper term is "politicly preferred for the surturn route. Yoursaly upparent rationular is " domither resources and hit that arrogently selecting the nest experime rente, perticularly when BPA selecting this an existing R/W nerts by some it the steepest and most rugged terrain in the state of Mintaur. I demand that the BPA consume mare plyy acting there you send interpositions cronies to sit and allow the public to vent their anger, while these comments either never reach or are discurded when BPA cloredy his an existing R/W north by Hot Springs PEter Johnan, BPA administrator has publicly said that earstry R/Ws will receive first consideration, and get your planess out to doinand complex burning that the left hund no bryan knows what the right kind is doing. You are un embarrossmont to the pape of the United States, purgare new that Springs rather than selecting a route to way. in year analysis - the public. Your, public meetings are see the simple logic of using pur existing Rful small countres. Impacts to the countres are all negative, and yet your planners opt to destroy a new strip of whereasted curring the BPA appears to be such a longe so involved in detail and techniculity that you amont in both Finencell and social respects. Thus rented is also the most expensive. I condemn the BPA for facing more finneled stress on the relepsych and L-SR-1-42 6

## L-0M-2-331

L-SR-1-42

incidentate and should be discurred of it justifies notions and only discurrents the thoughts and reducede of a very incompetent and contrand federal agains in considering your planning prices and DEIS as a whole, foryet sake, I can only conclude that it is a juke. And a very poor one at that.

(4)

Ardrew Kulle Star Rt 434 St Regis, MT 59366 Mr. George Eskridge Projects Information Officer Bonneville Power Administration Transmission Coordination Office P.O. Box 4327 Missoula, MT. 59806

Dear Mr. Eskridge:

I wish to go on record in your final Environmental Impact Statement as being strongly opposed to a portion of the proposed Taft C power line as described in the BPA Draft EIS on the Garrison-Spokane 500-kv Transmission Project.

The specific portion of this line to which I am opposed crosses Sections 4 and 9 in T8N and R13W in Granite County, Montana. This line will cause great economic hardship by interfering with our future mining operations in this area. This area has been mined extensively in the past and will again be mined when the economy improves. Your route crosses directly over patented mining claims with one of the towers located in the middle of one of these claims. This crossing will result in the majority of the mining claims becoming sterilized. The lost revenue due to the in-place ore not being mined can easily run into the millions. An extensive diamond core drilling program would be needed on your part to define the exact limits of the extensive ore veins and ore pockets. This drilling will cost you from \$ 250,000 to \$ 400,000 if properly done. If this drilling is not done, there is no way you can legally or legitimately determine the fair market value of the powerline right-of-way across these patented claims.

I am also opposed to this portion of the line because it crosses the townsite of Maxville, Montana. This is totally unnecessary when the nearest town to the north is 10 miles away and the nearest town to the south is 11 miles away. I understand that the Granite County Alliance has proposed a more southerly route for your Taft C line which would bypass the residential area of Maxville by several miles and totally avoid the aforementioned mining claims. I strongly recommend this more southerly route. Any additional cost of changing this proposed route at this point in time may become a genuine cost savings for the

## L-0M-2-33

BPA if you properly determine the fair market value of the right-of-way across these patented mining claims or if you fail to determine the market value and have to pay the ensuing court costs. Please weigh all you alternatives carefully. It may be just a line on a map to you but it is of paramount importance to those of us who live or work in the Maxville area. Thank you for your consideration in this matter.

Sincerely, Hillian (Malle

William C. Maehl President Maxville Mining Company 910 Maywood Drive Billings, MT 59102 Registered Mining Engineer State of Montana #5274

cc Max Baucus U.S. Senate Washington, D.C. 20510

John Melcher 27 W. Park Street Butte, MT 59701

Pat Williams Western Bank Building Missoula, MT 59801 Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in the record.

I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would disturb wildlife.

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Thank you for your consideration.

Sincerely. Carrier of medadur. James Ang sarbase prane:

Address: 4120 Linicoln Rd Missoula Mont 59802 L-MS-1-334

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

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Thank you for your consideration.

Sincerely,

ister Mitten 1360 Sauflower Dr. Name : Address: Missoula Mantana 59863

L-HN-1-335 a reson Mont-May 23 - 82 dear Sur-Concerning the-B. P. a. power lover, we are very much against it coming up Nine Mile Valley. We have been Anising Cattle here the past 40 years and have emit trankle keeping going without trankle keeping going the co. any more worries. The co. needs all the Tax money they Can get, so Can't afford to lose any county tax revenue Thresa J. Ramberg Huson mont Box 1700

L-MS-1-319

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 ky transmission line. Please include it in the record.

I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would disturb wildlife.

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Thank you for your consideration.

Sincerely,

Name: Address:

claise &. Bolliet 2501 Wylie Que. Missorela, MT. 59802

| L-MS-1- <b>320</b>  |
|---|
| 4000 Altura Dr.<br>Missoula, MT 59802<br>May 25, 1982   |
| Mr. George Eskridge<br>BPA<br>P.O. Box 4327<br>Missoula, MT 59806   |
| Dear Mr. Eskridge:  |
| This is in reply to your letter of April 9, 1982 and also in regard to the DEIS on the Garrison-Spokane transmission line. Please include this letter in the record.  |
| I appreciate the awareness that the BPA has shown of the severe impacts that a transmission line would have on the Rattlesnake NRA: on recreation, water, wildlife, and vegetation. However, the treatment of these problems is cursory, and there is no evidence that the detailed studies and data that are available on the NRA have been used. This is contrary to your letter of July 23, 1981 which claimed that the environmental study team was taking account of these materials.  |
| As regards the heightened fire danger due to the impediment that the<br>line under consideration would pose to aerial fire suppression, the problem<br>is at least mentioned in a general way. Perhaps the remarks in the DEIS<br>are sufficient for all the other segments of the routes being considered;<br>they are certainly not sufficient for segment 114. In the southernmost<br>part of the Rattlesnake NRA, there is easy access to recreational users,<br>intensive recreational use, heavy accumulation of fuels, extremely steep<br>slopes, and a history of human-caused fires requiring aerial suppression.<br>Most importantly, there are residences in closest proximity with limited<br>escape routes. Hence any hindrance to the free movement of aircraft in<br>the case of forest fires substantially reduces the possibilities of early<br>and successful fire suppression. This in turn greatly increases the dangers<br>to property and human lives. Let me repeat that a thorough investigation<br>of these matters must be undertaken before a final decision to route the<br>transmission line through the NRA is made. It would be irresponsible<br>of me regarding my obligations to my family and property I did not<br>insist on such an antecedent review. If necessary, I will seek the courts'<br>protection; there clearly is no question of my having standing. |
| Thank you for your attention.   |
| Sincerely,  |
| Albert Bergmann   |
| Albert Borgmann   |

L-HL-1-38

kt. 3, Bor 40, Haydeo Lare, Idalo Say 25, 1982

#### T.J.A. Broject Coordinator

### Sir:

I own land and reside in the impact area of the proposed Garrison-Spokene lowerline troject. I am opposed to the project.

BlA. states there is a need for this project based on increasing electric.) power demand in the panne of 3-40 per year. In fact, Remand studies presently indicate grouth to be in the 1-2% range. The " increasingly urgest need for new every " and the " newly identified need " no longer exist. The two largest industrial consumers in "orth Idaho and lastern Jushington are the Bund or Mill Coverny and the Vairer Aluminum Commany. Funder Hill has remainently shut down its operation in Vellere, Idaho. The result has been a loss of over "100 basic industrial tobs. Thus a lorge loss of exployment in supert industries to Further Hill. In addition. This r is currently involved in adderdining elect facilitics near Sychene which will result in a substantial reduction of an loyment and increased energy efficiency. There has been a thes evolve of residuatial constance and decreased industrialization the result being less onergy decend in the lastern Weshington and Northern Idaho area. The recent WISS, shutdowns offer corecte proof that projected energy louand for the Northwest has been propely overstated.

In fact, there is the optimistic presibility that we have even have a decrease in electrical compartion. Former Amelington State revenues, Dan Lyans, now head of the Lacific Morthwest Porcer Council

## L-HL-1-38

recently stated that we have only begue to touch the tip of the electrical conservation ideberg. A full scale energy conservation program, involving electrical producers and consumers at home and in industry, in both existing and future applications, would undoubtedly decrease electrical consumption. Even more optimistically, the the required conservation technology is current, basic, and affordable. I sincerely doubt, however, that what is in the best public is erest is what the electrical power consortium really wants. "Beir notto seems to be "more and bigger, and at all costs" and "runs the costs on to the consumpt".

Consider also the question of the legality of ELA. involvement with private utilities in this project. That is a public federal acency doing building poterlines for private power componies, some of which hoverlines are out of the federal agency's area of reor enablical jurisdiction? The prover 'econes somewhat more clear then one bees that for the private utilities to transmit their new Colstrig gover from lastern Montana to their areas of use far to the west, they would have had to cross nearly 250 miles of environmentally sensitive public and private land. Private utilities flatly could not have overcome this obstacle. Somehow, private Poter has " erseaded" a public federal areney to do this for them. A federal speece that has much easier access to public lands, that can use evident domain proceedings to condemn and seize private land, and that considers itself shove State laws regulating the location of major powerlines. How fortunate and economic for the private utilities. It agears that the ELA has become the lackey of the private power companies, who are relentless in the erransion of their private corporate greed.

Sinctrely, David Hatan

Dame Jama

propher inthe advant server of the whatthe problemes grow a sugar to server a preader stress the Stern Shile Cally - or - white Eur starting in read bran tiplet work store . . alant it thet astay treve totacter would be be back and the (B.) ille can be inagine wind the tecker of at can property, and the loss of (C) N/or to martine the dera luation Close saw mantine der sich . 1)/ay 1982a partice is go a succession in the cont it to and surey correction to the art The i act That the B. P. I. Sound Commences way man this so called stop and County tow Corrace L-HN-1-323 M. C. S. W. Widger, Dear in Earling this letter to express my disapproval of the new power line going through the Frenchtour, the Male, and Six Mile areas. The reason that people more into these areas is to be insay from sight and moise polition. They do not move here in porder to have 205 foot steel burnes in their yerds. I feel strongly that I voice the openions of many people living in these areas. "want our land changed like that. I hope that you will try your best to find another solution to the problem. I have lived here all my life and I pray that the day will never come when there is not another solution. These power line would change the whole appearance of the land and make way Sincerely yours, Torga King. Huson, But Way Six net Red L-HN-1-322 Marke you for your time.

(O) the section that the section with the the section of the section of the section of the state of the stiple L-EW-5-521 DEPARTMENT OF HEALTH & HUMAN SERVICES Public Health Service Bldg. 1, Room 511 Centers for Disease Control Atlanta, Georgia 30333 (404) 262-6649 May 24, 1982 and deveng Praser is true sewer (mas) Mr. George Eskridge Bonneville Power Administration Transmission Coordination Office and so escalial (ale don't think P. O. Box 4327 Missoula, Montana 59806 Dear Mr. Eskridge: they are!) - Sup the altrey from We have reviewed the Draft Environmental Impact Statement (EIS) for the Booneville Power Administration, Garrison-Spokane 500 kV Transmission Projpropertation interes. ect and are responding on behalf of the Public Health Service. We have reviewed this document for possible health effects and have no comments to offer, since the proposed alternatives have been adequately hesserbhe Jack, & Welders, Shocks However, the Final EIS should state whether or not any families will be displaced as a result of this project. If any relocations will be required, the Sy mile Rd. Box 212 relocation procedures that will be followed should be discussed. Fluser, Mt. 59846 Thank you for the opportunity of reviewing this EIS. We would appreciate receiving a copy of the final document when it becomes available. Sincerely yours, C. Tul & fulle Frank S. Lisella, Ph.D. Chief, Environmental Affairs Group Environmental Health Services Division Center for Environmental Health

John V. Evans, Governor Daniel T. Emborg, Administrator State Capitol Building Boise, Idaho 83720

# \_\_\_\_DIVISION OF ECONOMIC AND COMMUNITY AFFAIRS\_\_\_\_

May 21, 1982

L-01-5-336

Mr. George Eskridge Projects Information Officer Bonneville Power Administration Transmission Coordination Office 1620 Regent, P.O. Box 4327 Missoula, Montana 59806

Dear Mr. Eskridge:

The Idaho State Clearinghouse has completed its review of the GARRISON-SPOKANE 500-KV TRANSMISSION PROJECT DRAFT ENVIRONMENTAL IMPACT STATEMENT, SAI #00326656. The following agencies were contacted for their review and comments:

Department of Transportation/Division of Highways Department of Transportation/Division of Aeronautics and Public Transportation Department of Health & Welfare/Division of Environment Idaho Historical Society Department of Lands Department of Fish and Game Department of Parks and Recreation Department of Water Resources/Division of Energy Department of Agriculture

The Department of Fish and Game stated their major concerns with this project involve the Hayden Creek Drainage and the drainage that supples water to the Mullan Fish Hatchery. They would support modifying the route to minimize negative impacts to the Hayden Creek drainage and further request that you avoid the water supply at the Mullan Hatchery. A copy of their comments is attached.

Thank you for letting us assist you with this project. If we can be of further assistance, do not hesitate to contact myself or Lois Wade at (208) 334-3416.

Sincerely,

Mosia Maltatt

Gloria Mabbutt, Coordinator Idaho State Clearinghouse

GM:1w Attachment





DAHO DEPAR IMENT OF FISH AND GAME REGION 1 2320 Government Way Coeur d'Alene • Idaho • 83814

May 18, 1982

State Clearinghouse Division of Budget, Policy Planning and Coordination Statehouse Boise, ID 83820

> Reference: SAI #00326656 Garrison-Spokane 500-kv Transmission Project

Dear Sir:

The Idaho Department of Fish and Game has reviewed the draft Environmental Impact Statement for the proposed Garrison-Spokane 500-kv transmission line. From a fish and wildlife standpoint, Alternative C: Taft Plan is the most favorable. This line would traverse portions of the Coeur d'Alene National Forest that are already heavily roaded and disturbed due to past logging activities.

Our major concerns with this project involve the Hayden Creek drainage and the drainage that supplies water to the Mullan Fish Hatchery. We would support modifying the route to minimize negative impacts to the Hayden Creek drainage and further request that you avoid the water supply at the Mullan Hatchery.

Sincerely,

Danna Weiser

David S. Neider Regional Supervisor, Region 1

cc Bureau of Program Coordination Bureau of Fisheries Bureau of Wildlife

• EQUAL OPPORTUNITY EMPLOYER •

L-MS-1- 338 1-MS-1-339

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

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Thank you for your consideration.

Sincerely,

Rione Bilderback, Dand Bederback

Name: Diane and David Bilderback Address: 5220 Larch Dado Lavin Missoula, Montaria 59802

L-MS-1-340 L-MS-1-341

Mr. George Eskridge RPA P.O. Box 4327 Missoula, MT 59806

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Thank you for your consideration.

Sincerely, Vernox Ken Assure

Mame: UERNA . Ken GROWN Address: 1.14 Creek Crossing Missoula MT 59802

")making the conferrative former contract bound before completione. And every weeks could complete three plouts when needed checked thank the powertime could be built to obtain coaching this wills be no way to meles able priture . If the prustime was not built and an against the powerline continued in powerline Hucon, Montune 59846 and attention in the case of hours Englier alright if proven mecesari an justified, but this is mit the and I will see on the project L-HN-1- 342 power from montana. Jer 38. . 2 7 Johnst from The Unich medical follow to the be built on the level medical follows arous were not consulted regarding this and I doubt if the case when stand if taken to coust in the obser with all hydrolic fourt is then such he developed it meresally. Andrike and collating fourt could be developed in Montana cheafert Than the boat of the purposed Soundline. many times ober solinisted in read Horlay in Monthna and more could Jam a midland lenfamtur ireit. of think out brathmently were with an unnecessary and exorbitant bill Nay 25, 1982 of garden when they segued who let slakts we thue L-HN-1-342 5 licking to abandomented The salchest porter Leas Mrs. Cabridge :m. Lunge Ecteridae the load of the

L-MS-1-343 L-MS-1-344

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Thank you for your consideration.

Sincerely,

Day affirm & Peysily lan

Name: Name: Address: Address:

L-MS-1-345

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

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Thank you for your consideration.

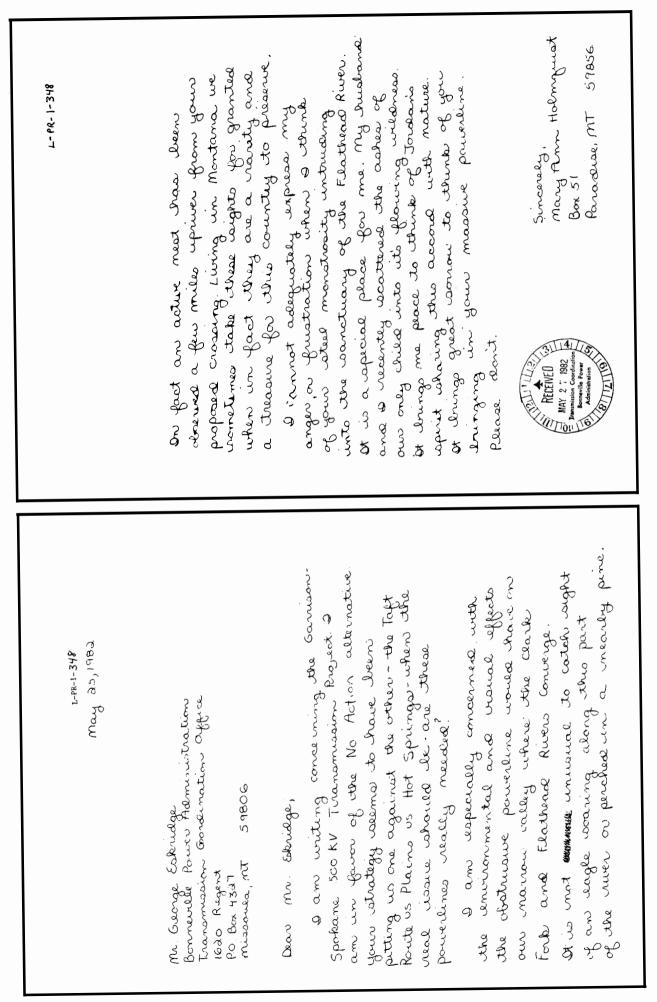
Sincerely, Sandy & Dha

Name: Address:

Ranky K. Delven 1204 Proveil Missoyla, MT. 59802

1281,9 1/1 - 12 × 18 33 - 1/19 1101 (15 - 1,8 - 1,2) NºZ 7 200 ishard 1 ני צרסרסן גערים גריוןביאראי אין בני עוריסן ואיכו דרחיון עדייריארור ואי ערט אינורג קמוכיברי קיניין ואיין הייוי ביויייי איירי הייסקו על גיו געיי גיין הייקרול אישירים יות ארוציקו הדדה איזי. קרבתרכן גור דיקעיין: ען קשעערתרכאי יקשיין איר אבר קרעקרקילי יקשיין אירות יושר קיקעין אינותי קאילי רקרוגים דר ער ניתי לרייי ל 2772424 לכת 14. x 14.00 13.1 אר אותקאי ארתקאי גררקאי 12-4 your you הרקני אבר הרקני אבר יות רחן בחיר הריים איר אות ליידים בחיר אותיים הרקני אות ליידים אותיים אותיים הרקני ובותה קיירידי אויי יכור ובותה קיירידי אויי ידים אותין ע 208 27202 241144 W 56 W 202 22 12 11224 2 magringung トル print grieg A2.77972299 זר נירך נירי ניימן 2 Klews Pracher the 12:1 3 121 12: 22 לקיוותי הקיגופרטיר riterorane 1377 יאן איי רידר ארידר איררן ד איררן ד קורוציקרינד וקט קראורי איריו אי מיקרייר בריך איר א' ירערים' קרירי 19201777 ההנברם נריםן וברואר אל inner 12 pronto ורידן וי Consura !! גויז × אישר הקצורי 11 (mr 1920) a progr (svigici) אזד nin -prim mileren w merdin ליקנפול נחיב קיבטח ביליקן על נפוריניול הצבעיר ביח שובו איי אילומינותייניול בן קיוח איול נחיב 022771 Kirkerge ... sport LhE-1-SW-1 9hE-I-SW-1

in course als Jung איצירומיר ביי איי ריאי ניין איי בייניא pringersig אצירוניטן שני אין עיקרישייש גרייים איר אינייים אין ידר ברשי בעוב אידטין עי אידעילי איר ידר ברשי בעוב אידעילי עי אידעילי קרי דיר בעוב בעוב איר בעוב ואיר איר ביירור בעוב ואירו העיך כב אין איריר ורי ידעי אורין אירו העיך כב אין איריר ורי ידעיר אורין אירו העיך כב אין איריר איר עובי אורין אירו העירו בעוב אירין V.72 pro t / 5787820 prime tered אשר ברר או בקרואנוריבן לאי הי התקצותי איז הייזן הייזן ביין היין התקצותי איז הייזן הייזק ביין הקרן זהן היין החיך הייזה הייזין ג'וו בייקרי ביינה היינה היינה ג'וו בייקרי ביינה הייזה ג'ון ביינים ג'וו הייזין בייזיתי ג'ון ג'וו היידים ג'וו הייזין בייזיתי ג'ון ג'וו היידים ג'וו היידין בייזיתי היידים איקיית קייתינין נ ידירין יידירין ידירי 27 2775 The second personale freedor צאיצו 62121 her in the V Brite גארן ניהן 18242 ן ביר לא איר המריע איז ביין ארג דעי ניינרי , על לי אידין They is 21 7 2 M 2.62% עדיוביאינייאונטי קטניריות רעור אילונגו annin the הגנאור דירך רו אמרהע porige privage 646-1-50-7 946-1-50-7 5.361 '7 5 hmy



## L-SR-1-9

Retyped from Original Letter

May 26, 1982 Laura L. Palmer P.O. Box 18 St. Regis, Montana 59866

Dear Peter T. Johnson and George Eskridge

This letter concerns the 500 kV transmission line from Garrison-Spokane.

If BPA doesn't have to be responsible for payments for use of private property and or in lieu of taxes for the property the transmission line crosses and destroys the value of.

I feel MPC should take full responsibility for payments and the tax loss in all the counties the transmission line crosses, the line is for their (MPC) benefit and profit, or the politicians that made BPA choose alternate routes in order to get more votes for themselves.

Since there are already existing lines, corridors, roads and easements, which would be least cost to the consumer, and most energy efficient, plus those sections of land have already been destroyed, another line right next to or above what already exists wouldn't make that much difference.

The destruction of all the timbered land that would have to be cut for corridors, and access roads would be devastating and absolutely unnecessary, also obtaining easements for a new route, time consuming and expensive.

Sincerely

/s/Laura L. Palmer Tax Payer Property owner Concerned citizen Registered voter

If there is an alternative for no transmission line it should seriously be considered.

#### Retyped from article submitted

LINE HURTS US ALL

After hearing the bad news of huge electricity rate increases because of the WPPSS fiasco, the choice of BPA's 500-Kv powerline location is the concern of all electricity users, not just the people who will be living near it. Its location will affect everyone's bills, all Montana Power and REA customers.

Upon reading the EIS Summary sent by BPA and comparing the three alternatives, I believe the choice of location should consider cost as well as environment.

Alternative A--Hot Springs Plan, is listed as the lowest total cost (\$185 million) and also has the lowest transmission line energy loss and least amount of new non-parallel right-of-way required (119 miles). I believe this route could prove to be the most economical for ratepayers.

The alternative that is being pushed through the media as if it is already final, which it is not, is Alternative C--Taft Plan. This is environmentally preferred by BPA. This plan is listed as the second highest total cost (\$189 million) and has the highest transmission line energy loss of the three choices and most new non-parallel right-of-way needed (224 miles).

The decision of where these powerlines are placed will not please everyone, but I think we all understand that none of us can put up with the neverending increases in electricity rates.

We can't just sit back and let another WPPSS happen. We should all get involved and encourage the building of the powerlines where it will give us, the customers, the cheapest rates.

Now is the time for all affected to speak up. We can't let a few people make the decision for us. We should read the EIS Summary and make up our own minds because all of us will pay no matter where the line runs through Missoula.

My vote goes to the Hot Springs Plan--Lorraine C. Houppert, 1025 Lost Mine Loop, Missoula.

2000 a plante and will be In I a Summer Sine nut We, the undersigned, strongly support the views news of huge Line hurts cs ali We, the undersigned, strongly support the views because 0 After bearing the had news of huge ressed in the letter on this page. L-SR-1-9 electricity rate increases because of the WPPSS fiasco, the choice of BPA's 500-Kv powerine location is the concern of all electricity users, not ADDRESS Dephen M. Meuchel P.O. Box 684 Superior 171 (Invision & Ducku R.C. Box 589 Superior MT State Actual Tex 316 Superior MT Box 31 Superior 51812-C. A. M. Superior, MT 59872 expressed in the letter on this page. L-5R-1-9 ADDRESS just the people who will be living near it. Its location will affect everyone's Cistle Dir traspis Augener Cistle Bot 843 Superior Mat bills, all Montana Power and REA customers. customers. Upon reading the EIS Summary sent by BPA and comparing the three alternatives. I believe the choice of location should consider cost as well as environmen Son 645 Superal In State Marine Box 199, Superal Mit State Provide Box 199, Superal Mit Lunara Madburde Pox 181 Superior Met Marine Model Pox 181 Superior Met Marine Model Box 181 Superior Met Defence Ma Muller Rt. 1 Box 4102 Superior MT 54872 2 Porrene Bay 38 - 11 - 21 D 

L-MS-1-366 L-MS-1-367

May 25, 1982

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in the record.

I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would disturb wildlife.

I want to record my strong protest regarding the fact that the BPA failed to note the visual impact of a line through the existing corridor on the entire northern vista from Missoula; failed to take account of much available research regarding the recreational use, the wildlife, plantlife, and ecology of the NRA; failed to explore the effect of a line through the NRA on aerial fire suppression; failed to give proper and sufficient weight to the impact of a line through the NRA on big game winter range, on water quality, and on high user intensity; and failed to consider sufficiently the line's impact on thousands of homes in future Grant Creek and Butler Creek subdivisions.

Thank you for your consideration.

Sincerely. Non to Kallen

Name: Ronald and Karen Printz Address: 2510 Wylie, Missoula

 $\int S^{\circ} \ \ \, \mbox{We presently own and are trying to sell land in the Butler Creek area on both sides of the existing corridor. In the last two years we have had three prospective buyers "back out" because of the possibility of the transmission line going through the existing corridor. If the line goes in, both the aesthetic and monetary value of our land will drop drastically.$ 

TO: The Bonneville Power Administration L-SR-1-45 United States Dept. of Agriculture Bureau of Land Management Environmental Protection Agency

SUBJECT: Written Comment to The BPA Draft Environmental Impact Statement

In regards to the BPA's routing of twin 500kv powerlines through western Montana; generally I support the "No Action Alternative.

The Federal Government (BPA) should stay out of the power business. You use your big government influence to circumvent state laws, trample over private land owners, and immemently crush all opposition. You don't pay taxes, give fair prices for land, or maintain an operating budjet. No individual could afford to sue you and any local complaints would be lost behind bureaucratic doors in Washington or Portland.

You have no idea of the long range health affect due to  $e_{X,P}$ osure to the lines, or the defoliants you intend to use in forested areas.

State government is mandated to serve its citizens. The Montana government is suing you because you're violating our Major Faulity Siting Act. Is the Act only inforcible against little companies with small bankrolls? Are you working in the public interest? No way. Private Utilities are building Colstrip, presumably for profit. Nobody asked them to. Private utilities started the project let them finish it.

There is no demand for power on the west coast. If there ever is Washington can resume construction of its facilities there.

I realize that public comment is especially fruitless when supporting the no action alternative so here are my view oppossing the Taft Route.

The Taft Route through Mineral County traverses mostly primative, mountanous

forest land. Annual snow depth along the route reutinely reaches as much as 6 feet deep in some areas. Winter temparatures often dip as low as 30-40 degrees below zero. Cross canyon winds can gust over 60 mph uprooting trees and hopefully buckling 175 foot transmission line towers. Fire is a potential threat in the summer. Lightning is the major cause of the

# 2. L-SR-1-45

fires. Perhaps the electricity in the power lines would attract lightning. I'm sure the lines and towers are grounded but the lightning could still strike nearby starting a searing inferno that could melt wire and turn towers into so much twisted junk. While we're on the subject of destruction of the line; any nut with some dynamite strategically placed could wipe out a huge section of line and get out of isolated country unseen. What would happen to your power line then?

The Taft route would traverse prime big game hunting country. More than a few people derive there income, or table fare, directly or indirectly, from hunting. You might convince some big city dude that these powerlines would'nt affect big game habitat, but save your breath in hunting country. Let's ease up a might and only say "maybe" for awhile. Maybe big game won't be affected by easy access to their sanctuaries. Maybe long range, cross canyon, shots made possible in you right-of-ways won't result in more crippled slow dieng animals. Maybe the defoliant you spray on your right-of-way won't contaminate streams, coat wildlife browse, and eventually work its way to the stomachs of humans. Maybe disgruntled hunters will realize the powerlines are there for the benefit of mankind and they won't use your insulators for target practice. Maybe people will come to think of powerlines as anthing of natural beauty and a part of every primative landscape.

125 foot corridors are one thing in agricultural country, theyr's something quite different in forest country. The lines are ugly and the towers are ugly in farmland but the land under the lines and between the towers can still be used. Not so in forest country.

Mineral County's primary economy is relate to the timber industry. County residents stand to lose more than a 125 foot wide strip of timber producing land. Diamond International, Mineral County's principal employer, is complaining of high production costs and taxes now. Construction of the BPA line would only ag\_ravate the problem.

True, the Taft line would take only a little private land in Mineral County. Thats because there is very little private land to begin with. More than L-SR-1-**45** 

85% of Mineral County is publicly owned. That means a couple of acres here and there translates into a good size hunk of our tax base.

3.

Access roads in mountainous terrain are guoged out of the mountainside resulting in large cut banks, erosion problems, and removal of topsoil.

People from St. Regis to Saltese live in what is described as a TV reception fringe area. People in St. Regis for instance would receive a signal that has been crossed numerous times if the line is constructed through Mineral County.

If the Taft Koute is selected semi-primative land will be destroyed, a large tract of prime big game habitat will be forever lost, the transmission lines will be continually vandalized, weather conditions will hamper, or halt maintenance and repair much of the year, essential tax base will be lost, valuable recreation areas will be descroyed.

Much of the cost of construction could be saved if BPA builds along their existing corridor. Why doesn't the BPA use these savings to clean up that corridor, compensate the landowners, and improve their public image.

The existing Northern Route is crowded with powerlines already. The PBA and Montana Power has clustered the right-of-way with lines and now uses that as an excuse to look for a new route. Why don't they clean up their corridor? Because they don't have to. Why after all these years has the Taft Route become preferrred? The Taft route was always there. Could it be that the people planning these lines aren't as bright as they pretend to be.

I prefer the existing northern route for these reasons:

- 1. There is an existing, paid for, corridor.
- 2. The powerlines are accepted by the residents.

3. Construction would be faster because of existing access roads and flatter terrain.

4. L-SR-1-45

4. Removal of the old lines and towers would open up the fields and improve land owner-BPA relations.

5. No more big game habitat would be destroyed.

6. Grazing and farming under the lines would keep the right-of-way clear, naturally.

7. Future development of hydroelectric power at Thompaon Falls and

Noxon could we easily integrated into the line.

8. Total cost of the project would be less.

9. Maintenance of the line would be easier because of adjacent maintained roads.

10. Law Enforcement agencies and local residents along the line would protect the line from vandalism and theft.

11. Forest fires would not be such a threat.

The only reason the BPA wants the Taft Route is because it would give them an additional corridor. Eventually even that corridor will become cluttered. There is not one logical reason for accepting the Taft Route.

During one of BPA's public meetings, the BPA environmentalist proudly displayed a picture of an Osprey nesting on a transmission line tower. Is that the future for Montana? Antelope gone, their rangeland gobbled up by huge coal diggers. Fish gone, their streams contaminated with defoliant. Elk gone, Their habitat criss crossed with powerlines and accass roads. All gone, all that remains is one dying Osprey with no better nesting site than a BPA powerpole.

William & Sanson

WILLIAM E. SANSOM Box 4 St. Regis, Montana 59866

L-0M-1-**368** 

RT. 2 , BOX 93B STEVENSVILLE , MT. 54870 MAY 25 1982

BPA

ATTN : MR. GEORGE ESKRIDGE

THE FULLOWING COMMENTS ARE MADE IN RESPONSE TO THE DRAFT EIS FOR THE GARRISON - SPOKANE TRANSMISSION PROSECT :

- A. THE SUMMARY OF KEY DATA DOES NUT REALLY SUPPORT THE PREFERED ALTERNATIVE, K(Y) FACTORS INCLUDE :
  - 1. RUSTE A IS LOWER IN TOTAL COST
  - 2. ROUTE A WILL HAVE LESS LINE LOSS
  - 3. ROUTE A HAS A MUCH LOWER IMPACT ON THE FOREST RESOURCE (THE ECONOMIC KEY IN WESTERN ALMTANA)
  - 4. ROUTE A IS VIJUALLY SUPERIOR
- B. THE FULLOWING AREAS OF DATA APPEAR QUESTIONABLE ;
  - I. ALT. A SHOWS A HIGHER IMPACT ON WILDLIFE, DESPITE THE FACT THAT "A" IS ALUNG AN EXISTING ROSTE FOR OVER HALF ITS LENGTH,
  - 2. THE LOW MILEAGE OF "C" WITH "HIGH" ROAD ACCESS DOES NOT SEEM REASONABLE COMPARED TO "A"
  - 3. BT THE FRENCHTOWN MEETING, THE STATEMENT WAS MADE THAT "A" HAS ESSENTIALLY ACL READS IN PLACE, YET THE EIS SNOWS 27.6 MILES OF "HIGH" ROAD ACCESS NEEDS.
  - 4. ALTNOUGH "C" PASSES WITHAN "L MILE OF FEWER HOMES THAN "A", THE EIS DOES NOT SHOW HOW MANY HOUSES SU INCLUSED ARE ALREADY WITHIN "Z MILE OF THE "AN EXISTING MAJOR POWERLINE,

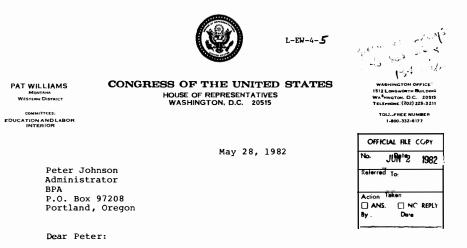
#### PAGE 2 L-0M-1-368

- 5 THE EIS DOES NOT SEEM TO RECOGNIEE THAT POWERLINE ACCROSS TIMBERLINE HAS A MOCH GREATER ADVERSE INFACT ON PRODUCTION THAN ACROSS FARMLAND IN TOMIERLAND ON ALINE STEEP SLOPES, PRODUCTION ON ADJACENT LAND ALSO BE AFFECTED. MAY
- C. Some ADDITIONAL FACTORS:
  - 1. CURRENT LAW DIRECTS USE OF EXISTING WHERE FERSIBLE. THE EIS IN CORRIPORS DO WAY DEMONSTRATES ROOTE A.2 IS NOT FFASIBLE
  - 2 A TRANSMISSION LINE IN AN ESTABLISHED CORRIDOR IS MORE LOGICAL THAN A LINE RUNIVING ACROSS FORESTED TERINAN, SOME OF IT PRESSIVELY UNREADED
  - 3. ANY POWERLINE SHOULD PAY ITS SHARE OF LOCAL TAXES
  - 4. IT SFEMS LIKELY THAT IF COSTS ARE UNDERESTIMATED (VERY COMMON ON FEDERAL PROJECTS) ALT. C IS CHEELY TO BE UNDERESTIMATED MORE THAN A
  - 5. WOULD THE IMPACTS OF A BE REDUCED IF THE C' ROJTE WERE USED FOR A-2 FROM GARRISON TO CLINFON?

ROUTE A.2 SHOULD BE SELECTED FOR THIS LINE TO ACHIRUS THE LEAST ECONOMIC, ENVIRONMENTAL, AND SOCIAL CUSTS

SINCERSLY . A Hut Thomas

J. KIRK THOMPSON



I am submitting these comments to supplement my earlier comments on BPA's Draft EIS for transmission facilities between Garrison, Montana and Spokane, Washington.

I am disappointed that you did not extend the comment period to allow for review of the State of Montana's decision with regard to the line. My request was logical and should have been granted. I make the further point that your response to me was sloppy. You did not answer my request in a timely fashion, but instead delivered your response to my office one day before the comment deadline, and then only after being requested to do so by my office. The delay is indicative of the attitude BPA has displayed to all Montanans concerned about this project throughout the EIS process.

Since BPA has determined that the Taft Plan is "environmentally preferable", my comments will focus on improvements to the Taft centerline location and method of construction.

### Maxville

As you know, I have written BPA on four previous occassions with regard to the Maxville controversy. The present centerline location is unsuitable due to its immediate proximity to many permanent residences in that small town. The most significant environmental criterion must be the health and safety of people. Therefore, it is alarming that BPA did not field check the estimate of residences in Maxville until after the Draft EIS was published. Similarly, it is alarming that BPA's printout of Urban and Dispersed Development shows the centerline segment through the town of Maxville

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L-EW-4-5

Mr. Peter Johnson May 28, 1982 Page 2

as having 0.0 miles of either urban or dispersed development. This clearly is a significant flaw in the centerline location, and casts very serious doubts on BPA's past assurances to me that the human considerations in routing selection were carefully analyzed. When presented with this evidence, Mr. Jerry Frick, BPA's Engineering Manager, admitted to a member of my staff that the Draft EIS was a "deficient document" in its treatment of the centerline location near Maxville.

In past comments to the Draft EIS, I have encouraged BPA to identify a new centerline south of Maxville which avoids these homes. Mr. Frick has assured me, through my staff, that an alternate centerline south of Maxville would be identified, analyzed, and compared to the flawed centerline in the Final EIS. Based upon the overwhelming evidence which has been submitted to BPA since the publication of the Draft, I now fully expect the Maxville centerline to be moved to a new location south of the town in the Final.

## Miller Creek

Owing to the concerns of the Miller Creek residents over visual impacts, I hereby request that BPA perform an intensive, site-specific analysis of underground transmission in the Miller Creek area. This analysis should compare the benefits as well as the costs of underground to above ground transmission. The crossing of the Bitterroot River directly bisects two of the most populous areas in Western Montana--the Missoula and Bitterroot Valleys. Montanans have been reasonable in their assertion that the increased costs of undergrounding along this small seqment are not prohibitive. The Bonneville customers in Spokane, Seattle, and Portland will receive the greatest share of the benefits associated with the transmission of this new, Montanagenerated power. By any measure of equity, they should also be willing to absorb the marginal increase to the overall project cost should undergrounding be proven feasible at Miller Creek.

#### St. Regis

Now that an alternate route has been identified which would reduce the visual impacts to the residents of St. Regis near the Clark Fork crossing, I encourage BPA to continue to work with the Forest Service to incorporate this new small segment into the overall Taft Plan.

#### Future Corridors

The study of corridors across Western Montana by BPA for the Colstrip Transmission Lines raises another serious issue which needs to be addressed. As you know, the so-called "20-20" study

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Mr. Peter Johnson May 28, 1982 Page 3

identified as many as seven corridors across Western Montana. The Garrison-Spokane Draft EIS focused on three corridors. The corridor analysis over the past several years for the Colstrip installation undoubtedly produced a great amount of data which identifies those corridors which are, or are not, future candidates for electrical transmission. Montanans now deserve to know which corridors are viable for future power lines by BPA. Therefore, I request that the Final EIS contain a full discussion of which corridor alternatives have future possibilities, and which have been ruled out.

In conclusion, let me restate what I said in my Phillipsburg statement. I insist, and from this point, will require you to adopt a more responsive attitude, so that the comments of all Montanans are seriously and carefully analyzed. The Draft EIS was deficient in many areas. Although others have called for a new Draft EIS to be written, I have not. This is part of the NEPA process. The Final EIS must correct the mistakes of the Draft, and it must answer all comments received by Montanans during the comment period. In the months ahead, I will be informing my constituents that each and every comment to the Draft must be seriously addressed in the Final, and that if they are not, I will work tirelessly to ensure that the Record of Decision reflects those concerns.

I have read your recent newspaper ads which carry the slogan "Remember, what you say counts." Here is what I say. If the **past**unresponsive, flawed, deficient, and sloppy attitude and work product of BPA continues; I will use every administrative and legislative avenue available to me to correct the situation. In short, I will raise political hell.

Best regards.

Sincerely, Pat Williams

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L-EW-4-5

CE/BPA-AB

Honorable Pat Williams House of Representatives Mashington, D.C. 20515

#### Dear Mr. Williams:

This is to acknowledge your letter of May 28, 1982, in which you submit your comments on the Bonneville Power Administration (BPA) Draft Environmental Impact Statement (EIS) on the Cerrison-Spokane Transmission Project.

We appreciate receiving your comments and those of your constituents who have expressed an interest in the project. You may be assured that all substantive comments will be given serious consideration and will be responded to in the Final EIS.

Thank you for giving us the benefit of your thoughts, and we quite understand your position in this matter. Should you or your constituents desire additional information, please lat us know.

Sincerely,

(Sgd.) EARL GJELDE

333 17 350

# ACTING Administrator

May 24, 1982

L-AL-3-369

Mr. George Eskridge Bonneville Power Administration Transmission Coordination Office Box 4327 Missoula, Montana 59806

Dear Mr. Eskridge,

As members of the Alberton-Ponderosa Acres-Southside Road-Iothrop Community, we stringently oppose the location of proposed B.P.A. powerlines in our area. We most vociferously oppose the Taft Plan, which would cross the Clark Fork River near the mouth of Tank Creek and/or Nine Mile Creek.

If this "plan" becomes a reality, we would propose that the line come out of Tank Creek, cross the Clark Fork west of the Sudan Crossing and up the bottom of the Eddy Creek drainage to the ridge north of Alberton. While we resist <u>any</u> crossing of our area, it seems that this would cause the least detrimental impact in our area.

If the line were to cross at either Sudan or Nine Mile;

1) no route - no action would be our first preference. Is there truly a need for future power in the Northwest? If the need does exist, could it not be more economically met some other way? How much has this powerline plan contributed to the W.P.S.S.S. construction shut-down and consequently the loss of millions of dollars to consumers in the form of increased rates?

Again, if the line is going to be built, the route with the best land utilization is the Hot Springs route, where a power corridor already exists.

2) If you choose the Taft Route, you should do everything possible to lessen the impact on residents where the lines would cross the so-called sensitive areas, i.e. Nine Mile-Clark Fork Valley junction, because there are relatively few such areas slong the route. Tower visibility should be measured with residents in mind, not passing motorists.

Why is the Taft Route being called the environmentally preferred route when it is the one which will cost the most to build, cause the most voltage loss, and ruin the greatest amount of productive forested land?

Before we reiterate herein our compromise suggestion, let us cite some of our dissatisfaction with the currently planned Taft Route:

1) Possible health hazards do exist and are being scientifically validated on an on-going basis currently.

L-AL-3- 369 2 AL 3 370

#### Eskridge, page two

2) The damaging visual impact of the line from current residences on Ponderosa Acres, Southside Road, Lothrop and the east of Alberton is readily apparent. This visual impact would also be extremely debilitating to future growth of our area because it would cross directly over two already platted subdivisions. Another negative ramification of this stifling of potential growth would be a disastrous erosion of potential taxable valuation of an already declining tax base, leaving the current residents a heavier tax load for the financing of necessary services, i.e. schools, roads, and fire protection.

3) Relative to usual and customary amenities, the negative impact on residents' reception of radio and television has not been resolved. We feel entitled to the services of mass media and pay for it in terms of purchased goods and services, utility bills; and rely on it for current events and liaison with the total society.

4) Access roads to the B.P.A. facilities would also be environmentally unsound as well as creating a visual blight.

5) In our populated area, B.P.A. would provide nothing in terms of revenue to our area. You would provide few, if any, temporary jobs, no revenue "in lieu of taxes" and not even any impact aid.

Provided that the "no route" option is not sincerely a viable one, and further provided that the basic Taft Route is utilized may we suggest an alternative, presented below?

Given any route at all, it sould not be either of the two existing proposals, but rather a route that would cross upstream of the I-90 Clark Fork River bridge, west of Nine Mile hill, east of Ablerton, then follow up the bottom of the Eddy Creek drainage above the former Armstrong ranch. It could then cross over the ridge east of Ellis Mountain. When it again bears west, it should be placed on Forst Service property sufficiently north of the ridge north of Alberton so as not to negatively impact the town visually.

This route would present the least amount of negative impact in our total area, including the Nine Mile Valley.

Thank you for your consideration of our objections and our suggested alternative.

C. Doo han Bruce and Audrey Silmore Sincerely. Thomas P. and Margot C. 7. Thomas P. and Margot J. Dobhan Wayne G. and Linda Deterson Togy of Dois Hoger Hoger and Docis Hoger Joseph and June Abramavage Joint School Dist. #2 Box 118 Alberton, MT 59820 Joe and Loretta Hanmond Jom Joma Marun Tom and Regina Marvin Gler + Donne Victor Albert and Eva Blackman Allers & En Blackman Glen and Donna Teeters Frank & Bethy anne Killer. Frank and Betty Ann Kibbe

L-MX-1-384

Mr. brow E. Lindge Bonnavelle Fora: Odminst water Massila Mastance

# Deen Sus

I am mining in regard to your proposed soc kt line, in general I don't see any reason for building this line through Montana at all rachen Montonia will not get any good out of it at all also then is a question as he the health horacels of the huge lines, and also you prople don't pay my topes to the State To particular the Taft route over Maxwelle and the What valley is terriable you could have gone a little more south and you would have missed Maxwille and the most of the private land after all this is a public project so use the public lond.

יציין שרדי דרי דרי לי אוייך צריים איין איין עייל שליוציי יציי דרי דיוא קייני בר בור ביור ביו עי ורי בייירי בין בער ביור אייור ביו reary more al in the contract of the sea of a DA Concerting foresta antes aco March עיייך ל בן נייני ך כן ברך יד ליו אנת ארובינים. purchase of and a strend the second Charade Lla Haberthe Caras Jane And approved by a sign of an england Try sufferner to the bight bight Aucher and the free of the stand and the second to second the second stip to S. Ingention when the contract D.I.G. stime any prainty 1-48-1-3**82** 

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Missoula, Montama, May 25,1982 L-MS-1-386 1-MS-1-387 L-PB-1-325 Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806 many propertant factors , crae. surge pronty part togetties and with furthe plans to and Jame a mander of Grante, County alleginees about Sengeres C many af this line to a more Dear Mr. Eskridge: This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in the record I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly sutter in mater man or in serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable condor E. if it is the because construction would endanger the municipal water supply, the line would destroy the recreational value of a heavily used area; the line would built but digane That is a greatly diminish the value of the nearby Wilderness area; and it would sury his que ton. Ittente you shalled severe the side to disturb wildlife. I want to record my strong protest regarding the fact that the BPA failed to note the visual impact of a line through the existing corridor on the entire northern vista from Missoula; failed to take account of much available research regarding the recreational use, the wildlife, plantlife, and ecology of the NRA; failed to explore the effect of a line through the NRA on aerial fire suppression; failed to give proper and sufficient weight to the impact of a line through the NRA on big game winter range, on water quality, and on high user intensity; and failed to consider sufficiently the line's impact on thousands of homes in future Grant Creek and Butler Creek subdivisions. Thank you for your consideration. Sincerely, Comma Recommence Adverse Address: 3023-Rattlesnake Rod Missaula montana

# L-MS-1-388

Mervin O. Eriksson, PE 2401 South Hills Drive Missoula, MT 59803

Mr. George Eskridge Projects Information Officer Bonnevile Power Administration

Dear Sir:

I was disappointed to read a quote by you in the paper recently in which you stated that BPA is still strongly considering powerline routes other than the environmentally preferred route.

I realize there has been heated opposition to the environmentally preferred route by the people it affects. However, this outery is minor compared to the opposition which would occur if either of the more damaging routes are chosen.

Costs do not appear to be a determining factor since the preliminary costs for all 3 routes are essentially equal (the differences are substatially less than the probable variation in the estimates).

I am particularly interested in keeping the powerlines out of the Ninemile Valley. This environmentally sensitive, unspoiled valley would be seriously damaged if the powerline is built on either side of the valley. I feel that this damage is entirely unnecessary when a transportation and powerline corridor already exists along the Clark Fork Valley, which is the environmentally preferred route.

Thank you for your time and consideration.

Sincerely, Mor O. Eikno Mervin O. Eriksson pr

L-SR-1-122 L-5R-1-389 May 2, 1582 Dear Sir, This is my written statement to be attend in the final Environmental Impact statement " all of my neight Taft plan" Through Mineral County & particularly the "Tonarack alternating !! Enclosed is an unticle expressing our feelings which I would like also included in your fint E.J.S. If the line must be built, we believe The that spings plan has the

L->R-1-122 L-SR-1-389 Jud uppeld be the most sincerely, bly Mauren Even Po San 293 St. Regio m.f. 53566



# **Powerlines still** not justified

The hearings offered by the BPA have thus far generated a great deal of controversy. By presenting the issue in as a northern vs. southern route,

#### Reader comment.

they have succeeded in polarizing the opposition.

It is time to re-examine the issues, unite the opposition and address the real question: Should the BPA build the powerlines at all?

The BPA neatly sidesteps this question in its environmental impact statement. BPA claims that the need for the power and the lines was ad-dressed in the Colstrip impact statement, and thus is beyond contention.

This is pure foliy. Even their own projections show lower energy demand in the years ahead than they bad presionally projected. And inde-pendent atudits, point to lower usage. Lower demand, conservation, the clos-ing of Bunker Hill and other big users, and continued recession (and future inevitable receasions) all point to a need to question BPA's plans.

I am not castigating the BPA as a whole. Indeed, the agency has done a great deal in providing power for the Northwest. But the BPA should not be the one to "prove" the need for its own projects.

£

Government agencies tend to un-failingly justify the need for their own projects. The reason is simple: They need the projects to reason their own continued existence, in general they opt for the most grandolse and expensive projects, always justifying them in the public interest.

At some point agencies cross the threshold of serving the public interest and begin sarving their own and thet of a limited (often corporate) constituency. History has shown this to be true, be it the Glen Canyon Dam or the MX missile.

Government agencies tend to perpetuate themselves. New projects Insure jobs, increase budgets and add prestige. I thing it's time to re-examine the

needs of the public interest and the need for the powerlines, in view of the above considerations. Those working against the powerlines should units on common ground. The BPA should not be relied upon

to justify its own project. Independent energy projections and environmental analysis are needed. Perhaps the pow-erlines should justify themselves in the free market.

At any rate, these, and other pertinent questions need to be examined before we again oredienaly blueder into the degradation of our landscape. - Jack Teholake, 8155 Mullan Road, Missoala. ١.

VI-222

L-5R-1-122 L-SR-1-389

L-HN-1-390 L-HN-1-391 May 24, 1982 6

DIPLOMATE AMERICAN BOARD OF ANESTHESIOLOGT

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#### PELLOW AMERICAN COLLEGE OF ANESTHESIOLOGISTS

JOHN A. HARRIS, M.D., P.C. AMESTHESIOLOGIST 3106 OLD POND ROAD MISSOULA. MONTANA 59801 TELEPHONE (400) 728-6615

L-MS-1-**392** 

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Down Mr. Eskridge:

This letter is in response to the Draft Environmental Legact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in the record.

I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollutior; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness are;; and it would disturb wilcliffe.

I want to record my strong protest regarding the fact that the BPA failed to note the valual impact of a line through the existing corridor on the entire northern vista from Missoula; failed to take account of much available research regarding the recreational use, the wildlife, plantifie, and ecology of the NRA; failed to explore the effect of a line through the NRA on aerial fire suppression; failed to give proper and sufficient weight to the impact of a line through the NRA on big game winter range, on water quality, and on high user intensity; and failed to consider sufficiently the line's impact on thousands of homes in future Grant Creek and Butler Creek subdivisions.

Thank you for your consideration.

Sincerely, (illano mes

John A. Harris, M.D.

JAH/sa

## L-MS-1-393

Mr. George Eskridge RPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

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Thank you for your consideration.

Sincerely.

Dighton Little Name: Address: X J. ughten Sutte 2300 Ratticenake der Mussaula, Mt.

59802

# L-HL-1-38

Pay 25, 1982 Rt. 3, Eox 40 Mayden Late, Idahe

Sir:

I own lend in the Chilco area near the proposed right of way for the FLA Garrison-Suckane to orline Project. I um extremely corcorned about thelocation of this powerline in this area.

We live in the area of steep sloves and heavy erosion problems. muc offer developement projects in this area have resulted in hajor erocion, soil loss, road waslowts, and sedimentation of streams and reservoirs. Even though the F.A claims this area to be of low crosion motinial, the Soil Conservation Service classifies the right of way also to be of very high closion hezard jet ential. local everience has proven the SOS to be correct.

1 and many others have a considerable investment in real momenty in the ispace area of the powerline. The studies contioned in your draft AIS state that there is no conclusive evidence of real property devaluation on or near powerline right of way resulting from coverline construction. I conducted a local area survey on this natter, the results of which have your nonconclusions to be vame and misleading at best. I sorvered local realtors, prospective raral acrease buyers, developers, and procorig owners along existing similar transmission lines. The result has that for this area, powerline construction would result in major develoation of rearby real procenty.

J also find that the F A has done poorly in the preconstruction modification of instacted property exercis. Several is this local area, or ing property bordering the proposed right of way, were not netified by the EFA, and have not been notified by them to this date. then I notified them, they expressed dishelief, ander, and objection. Another impacted property owner objected strenuously when correctly informed as to the sive, type, and proposed location of the line.

## L-HL-1- 38

Yo one I talked to lnew that additional powerlines in this corridor might be built in the future. All were opposed. Since there are so fer private projecty owners in this local immact area, it would have taken only minimed FLA effort to contact and fully inform then of this project and its implications. This was not done. It could be arread very strongly that the FLA make a concerted effort to keep public swareness of this project to a minimum, thus reducing opposition to it.

Whe confort projosed right of way location in the Chilco Take area is one of intense concern. The line is projosed to cross wight over filled lake, with a tower to be built on a scall bluff right at the shoreline. This right of way location and to ser sight of the shoreline. This right of way location is would desired a periodally treasured vista. I question the spirit of any entity, public or private, to be so bellightently environmentally destructive. There are close by right of only locations in this area i would much less impact.

Sincerely,

David L. Hamen

Davie Haina

# Frances S. Fleard

# Route 3 Box 41, Hayden Lake, JD 83835

Eay 26, 1982

ar. Secre skidze Frojects Information Officer DFA -ransmission foordination Office PC Dox 4327 Fissoula, NT 59806

Wear Mr. Skridte:

I testified briefly at the Artil 13 herrin', Northshore, Coeur d'Alene and broucht home an autoload of BPA materials on the proposed transmission line which would cross throck Drivener whiles take. I rotest d that so e of our neithbors were notified of the meeting but others were not, including some much nearer the proposed line than we. Our names were not included on pr. VI-20 ff of the Draft invironmental Irmact Statement (100/MIS-0091), March 1982.

Rimrock Drive is maintained by the Lakes Road District. Deer sullies were cut during the spring run-off on the cast side of the road which were marked with warding dams memored only recently. In other words, the soil which the TR clasifies as low for damage of erosion is easily washed out when the hoads break up in late winked or easily spring. The PS Soil Conservation Service classifies the effection damage for this area as extreme.

Furthermore there is the 1 rater question of whether the Northwest needs more electrical nower. With the Funker Hill Kines crisis still unsolved and the WirKS disaster it seems that industry is moving from the area or is likely to move from the area now that we can no longer boast of chean nower rates. Ho we actualy need these transdission lines? Conservation of our energy resources is abharently worder botter than anticipated, eliance on "appropriate technology" could do even more. At all events, I hope to attend the June 9 Conservation torkshow in Grokane and how more.

incidentally I appreciate this next opportunity to marticipate. and I enjoyed the theorem has another ness of the IS.

Sincerely y ups

T WHEN I Hard

Cony to Lakes BoarDistrict For 569 We aylen Lake, IN \$3025

Frances S. Peard, sh.D

#### L-HL-1- 35

# I-HN-1-283

Hueon, 5/26/82

Mr. George Eskridge Bonneville Fower Administration Transmission Coordination Office P.O.Box 4327 <u>Miscoula</u> Mt. 59806

# Deer Sir.

I, Fred Rappe, have read the EIS of the powerline, that will go through Western Montana.Some areas of the EIS are acceptable and some are not. The healthissue could have been handled much better.You seem to ignore that the powerline can have or have helthricks for human being and domestic enimals.Several people, that live under powerlines in Minnesota, have had both phisical and mental trouble with the line.Even their domestic animals have had trouble.Some of you wight think, that it could effect living things, because you want to do a study if the powerline will offect clk.Before any powerline is build, it should be growen s.fc. We human being should not be gained pigs.

If this powerline is build now, and if an other powerline is build in the same powercorridor at a later date, that effect will be blave on human beings? Nothing is said about that.

If any human or domentic animal has any ill effect of the powerline, who should pay for the bill? As I see it BFA should. Nothing is said about that.

This powerline is not needed. Only 2 of 5 nuclear plants are being built in Washington and a coal-plant is supposed to be built in castorn Tashington.

Sincerely C. Fred degro 6 Mille Rd.

Huson, 111, 59846

May 26, 1982

George Eskridge Bonneville Power Administration Transmission Coordination Office F. O. Box 4327 Missoula, Mt. 59806

Dear Mr. Eskridge;

The Valleys Preservation Council has always been concerned about the effects of energy corridor development on people. BPA's Garrison/Spokane 500 KV transmission line draft EIS has identified a number of routing alternatives through western Montana. Of these alternatives, segments 1, 4, 6, 7, 144, 145, 146, and 148 seriously threaten the health and environment of the residents of the Frenchtown, Six Mile, and Nine Mile valleys. The enclosed petition indicates that there is <u>significant</u> concern among the area's residents regarding those segments. We feel that BFA has not made every effort to route the proposed transmission lines away from people. We demand that BFA make that effort. Thank you for your attention to this matter.

Sincerely,

Jan Rappe

Valleys Preservation Council P. O. Box 141 Huson, Mt. 59846 L-HN-3-400

L-HN-3-400 May 1982

THE FRENCHTOWN, SIX MILE AND NINE MILE VALLEYS ARE PRIME FEOFLE HABITAT . THE FROFOSED BPA POWERLINE THREATENS THE HEALTH AND ENVIRONMENT OF THE RESIDENTS OF THESE VALLEYS. THESE POWERLINES MUST BE ROUTED AS FAR FROM PEOPLE AS POSSIBLE.

NAME

ADDRESS

Dave West 1/1 422 Darlene D. West Manijoyce moste Capierty 42 Hiser Towell Erma 672 43 Widgren JerryA Dairs m gairs Janet H Clark Donark EIN News Shirley A. Tucker J.E. Tucker Jeannette Warne SaudreL Le ma 11.1.1

545 L-AN-3-400 MAY 1982 THE FRENCHTOWN, SIX MILE AND NINE MILE VALLEYS ARE PRIME FEOFLE HABITAT . THE FROPOSED BPA POWERLINE THREATENS THE HEALTH AND ENVIRONMENT OF THE RESIDENTS OF THESE VALLEYS. THESE POWERLINES MUST BE ROUTED AS FAR FROM PEOPLE AS POSSIBLE. NAL:E ADDRESS Kate Campbell 461 MI 59834 400 U1º 110 Martin P I Wicks Queen Nick Donna Commes Russell. Zola L. Dadlows 543 David everque Tara Levesna 2911 Donna D. Davis Kje II Brusta un tad borene 9 John W. 17 Cyr Lola M. E/mstrm Jack B. Mc Farland P Husen MT 59.46 mile und

L-HN-3-400 L-HN-3-400 MAY 1982 MAY 1982 THE FRENCHTOWN, SIX MILE AND NINE MILE VALLEYS ARE PRIME THE FRENCHTOWN, SIX MILE AND NINE MILE VALLEYS ARE PRIME FEOFLE HABITAT . THE FROPOSED BPA POWERLINE THREATENS THE FEOFLE HABITAT . THE FROPOSED BPA POWERLINE THREATENS THE HEALTH AND ENVIRONMENT OF THE RESIDENTS OF THESE VALLEYS. HEALTH AND ENVIRONMENT OF THE RESIDENTS OF THESE VALLEYS. THESE POWERLINES MUST BE ROUTED AS FAR FROM PEOPLE AS THESE POWERLINES MUST BE ROUTED AS FAR NROM PEOFLE AS POSSIBLE. POSSIBLE. ADDRESS NAME NAME ADDRESS A. Ippisch 9- mile-Al Huson 307 Bill Le mine Ret Box 201 Huson, MH STEFIL 489 Sayles 610 Many Ellen Sayles 193 Heron, 700.59846 545 r H Jack 323 my Monte 7 ymm H. As Shuel 512 Helen Shuck Betty Hofma 324 51 Brian Mether Donald SIL Pulliam G. Lefler Negy 10 000 marisine F. 0 515 Patti L. Leffler 6.7 516 kim Deschamps amos innon mt 51 Ren'Deschamps 1748.10 NyK ginia l 518 Angelika Genurz James D. 51 Leron Albert SallyL Minkle Bil 198 Dusenburg 59846 80 383 FIA Fran Dusenbury Nancy Anderson 59846 52 390 Betty St John 39 Sandm 5-4 0'Dell 502. no 11 Mrs. LaVA. Mc Down Gi Hida R 503 Donna Parie Keyser フルッ タギム Allen A. Hodge 504 Pat Parge Carol 5.25 215 desm Harvey Hadre Millhonse 51816 Dorothy H sus gotte, lette Heeron not. RQ Cause 1060 SV Dong Jette 50 11 Laurel Kain 530 ø :44 Mike Nelson 5,7% Box 400 19) MT-M.W. Le mmer ...

L-HN-3-400 L-HN-3-400 MAY 1982 MAY 1982 FR-CEAX X THE FRENCHTOWN, SIX MILE AND NINE MILE VALLEYS ARE PRIME THE FRENCHTOWN, SIX MILE AND NINE MILE VALLEYS ARE PRIME FEOFLE HABITAT . THE FROPOSED BPA POWERLINE THREATENS THE FEOFLE HABITAT . THE FROPOSED BPA POWERLINE THREATENS THE HEALTH AND ENVIRONMENT OF THE RESIDENTS OF THESE VALLEYS. HEALTH AND ENVIRONMENT OF THE RESIDENTS OF THESE VALLEYS. THESE POWERLINES MUST BE ROUTED AS FAR FROM PEOPLE AS THESE POWERLINES MUST BE ROUTED AS FAR FROM PEOFLE AS POSSIBLE. FOSSIBLE. ADDRESS NAME Heind ADDRESS or 1310, 17 1310, Huson 1846 GITL 1230 Vina LIN to Howlet Ver harkes 1 Hornington Fur Hrs. Charles V. Harrugton 4. regentan Martha Roseberg MA 20 ų Terry 54 Bi-X Witka 409 22-722 Harr Helen M. 410 11 -11 /// formation Ċ. 1000000 411 UN TimoThy hile 412 Than Ropert E. Thayer D. Hargare The Nine Mile 413 230 hayer Mile Husen Susan J. 1. 414 tel U James F 415 1. Hurray 416 Taura Cvr Die Dave 27 12:004 en. 46 Cyr Baier 417 Art 1217 Dawn Baier 418 Catherine Hopper 419 13 at en int, Roberta.S. 11. 1 1/11-1 1100 420 10 un n 11 1. 11 42 m Jim Curtiss . 117 m indu ŧ,

131 Main Rect Jon Strack Mary Land Mine Mile Husen 536 June Christian Christian 1490 Nine Mile Husen 537 Main & Strack North Strack 1490 Nine Mile Husen 538 June Christiane North All Mary Mary Le Husen 539 June Christiane North Strack 1490 Nine Mile Husen 530 June Christiane North Strack 1490 Nine Mile Husen 530 June Themas Mary Mary Land Land Line 1470 Nine Mile Husen 538 Junes 7 Strack James T. Stenens 1470 Nine Mile Husen 539 Remnice Mile June Junes 1. Stenens 1470 Nine Mile Husen 538 unis 7 Streen James T. Stenens 1410 538 Romminge Duringe Duringe L. Werner 1450 Faren There Adver 540 Take Stammer Tobie Wanner 1450 541 Learge U Johnson George Johness 1440 Ridgewood Rd 542 Sarbara E. Johnson George Johness 1440 Ridgewood Rd. 543 Of illian Bellia di William Cerkowski Ridgewood Rd. Ninie Mine 440 Mine Mine



L-MX-1-395

-May 26, 1982

# ROYAL OUTFITTERS

TY THROOP • MAXVILLE STAR RT. PHILIPSBURG, MT 59858 • (406) 859-3342 • (406) 549-1532

## Dear Sirs:

I wish to express my opinion regarding the proposed powerline fom Garrison

to Missoula; my feelings are as follows:

- 1. I oppose the entire powerline as I feel it is totally unnecessary.
- 2. I oppose the southern routing as I feel it is more destructive than the Drummond routing as well as more costly.
- I oppose the "corridor E" routing proposed by the Granite County Alliance.
- 4. I oppose the crossing of residences at Maxville.
- 5. I feel the Forest Service has done a responsible job of appraising the situation and I think their recommendations should carry considerable weight.
- 6. I favor looking into a route north of Maxville as the Forest Service mentioned in their study, as I believe there might be a possible routing which would be satisfactory to landowners and BPA.

Thank you

## L-нN-1**- 3%**

May 25, 1982

George Eskridge, Projects Information Officer Bonneville Power Administration Transmission Coordination Office 1620 Regent P. C. Box 4327 Missoula, Montena 50806

Dear Sir:

I wish to express that the proposed BPA powerline be routed as for easy from people as possible. By concern is, primarily that there has been insufficient study as to the health effects upon people who are living near these high kilovolt lines. I do not wish nor do I wish upon anyone else the position of guines pig.

> Sincerely yours, Jeannie Siegler Box 395 Conifer

Huson, Montana 19846

L-MS-1-397

HARRict Spurlock 134.9, Skydine BAAch Missoul, M1. 59802

George Eskridge Bonneville Power Administration 1620 Regent Missouh, MontAnt 59806

Dear Mr. Estridge: Regarding the Drapt Invironmental Impart Statement, Garrison - Spokane 500 -KV Praas mission Project:

I Am opposed to Any Route that Would follow the existing BPA Right-of-Way on the hillsidos North of Missoula, the EIS Refers to these Routos As the. Hat Springs or Plains Routes. These Routes would Bause the greatest Amount of Adverse Impart to the entire Missoula Valley Population, And More Spacifically the Residents of the Rattlesnoke Volloy, the Grant Greek Volley And the faim david between.

In Addition to being A depinate health hazard, the powerdine would be A most ugly eyosore wisible prom the entire Missoula valley And surrounding footh. 115.

L-MS-1-397

From the poisonal standpoint of myself Dad my family, it would diastically poduce the quality of our dives And the value of our homehand property that we have worked on And for these past 40 years. Taking All of the Adverse impacts into Account, I feel it is guite elear that the only Acceptable Route is either No Route At All or, if the NEED for A Route be positively established, A Route that would Stag Away from all populatod preas-And foundards, And would Keep to dards owned by the State And Fedoral Govern ments.

Sincer 4,



BPA, DEPT. OF ENERGY 4. S. Gov'T 1620 REGENT Missaula, MT.

Die Siks:

My hurband and Myself would LIRE TO Express our opinions concerning LARBE KV POWERLINES IN GENERAL AND SPECIFICALLY. THE PROPOSED ROUTE THROUGH NESTERN MONTANA OF A SDO KU POWALINE. WE BELIEVE FRAT, POWERLINES, OF THIS VOLTAGE HAVE NOT BEEN RESEARCHED ENOUGH IN THEIR IMPACT ON PEOPLE, ANI MALS AND THEIR ENVIRONMENT THROUGH WHICH THEY PASS. WE BELIEVE THAT THERE IS SIGNIFICANT INFO. AVAIL ABLE FROM PROSENT STUDIES. TO SHOW THAT THERE I'S AN EFFECT ON All THREE ARE AS WHRH IS NOT FULLY UNDERSTOOD. AND WHICH NEEDS THOROUGH EXAMINATION BEFARE ANY FUTTOR ACTION IS TAKEN.

5-28-82

REGARDING THE PROPOSED ROUTE THROUGH THE MISSOULA AREA WE BELIEVE THAT THE SOUTHERN LOLD ROUTS IS ESTHETTICALLY UBLY, COMES IN FAR TOO CLOSE OF CONTACT WITH HUMANS, AND WOULD BEA LIABILITY TO HOME OWNERS IN

**VI-232** 

L-HN-3-394 May 24, 1982 -2-L-LL-1- **398** L-LL-1- **398** Bonneville Power Administration Mr. George Eskridge, Information Officer THIS COMMUNITY. Transmission Coordination Office 1620 Regent- P.O. Box 4327 BURYING THE POWERLINES SHOULD Missoula, Mt. 59806 BE CONSIDERED IF NO OTHER OPTIONS ARE Dear Mr. Eskridge, VIABLE. Attached please find the comments and recommendations on the THANK YOU FOR YOUR TIME AND Garrison-Spokane Transmission Project Draft Environmental Impact Statement of the Valleys Preservation Council. The document first PLEASE CONSIDER OUR COMMENTS. lists our Areas of Concern, explaining those issues we believe are not adequately addressed in the DEIS. Then, we list recommendations for this project. If you have any questions, please call me at 626-5661, or Sincerely, Stere + Terryl Echert Chris Siegler at 721-1786, or 626-5611. 313 Tyled WAY Juf Sinder, Vice Pushet Loly, MT. 59847 Valleys Veservation Council Box 141 Huson, Montana 59846 JR/ps Enclosure cc: Senator Max Baucus Senator John Melcher Representative Pat Williams Mark Ledbetter, Northern Plains Resource Council .

VI-233

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## I AREAS OF CONCERN- DRAFT ENVIRONMENTAL IMPACT STATEMENT

## Legal Issues

Of primary concern to the Valleys Preservation Council (VPC) is whether the Garrison-Spokane Transmission Project Draft Environmental Impact Statement (Garrison-Spokane DEIS) is a valid document even worthy of consideration by federal decision makers. BPA has arbitrarily segmented the evaluation process by deciding on the Towsend to Garrison section. This predetermines the route west of Garrison and effectively precludes the comprehensive consideration of all viable Colstrip to Spokane routing alternatives.

Unfortunately, this haphazard and arbitrary approach to planning and siting is not new to BPA. In reviewing pages I-2 through I-10 of the Garrison-Spokane DEIS which outlines BPA's involvement with the 500-KV transmission lines from Colstrip, it becomes clear that the justifications for, and the selection of, routes have been changed many, many times. Such continued changes to what had once been a well defined project-- the Montana Board of Natural Resources and Conservation approved route, July 1976-- have resulted in blatant violations of federal and state law. By effectively deciding on a route before an EIS is prepared, and by failing to prepare a comprehensive EIS on the entire project. BPA is in direct violation of the National Environmental Bolicy Act. By refusing to cooperate with the state of Montana, BPA is in violation of provisions of the Federal Land Management and Policy Act and, most important; Montana's Major Facility Siting Act.

One of the primary reasons for the existence of these acts is the prevention of ill-planned and haphazard energy development. Well drawn-out plans should allow for the unforseen. Wholesale

## L-HN-3-394

changes based only on immediate circumstance-- such as the on-again off-again power requirements for the Kelbgg-Wallace mines, or alternating political pressures as in the Deer Lodge and Boulder Valleys-should not occur. But BPA has in this case made such changes continually over the all too long history of their involvement with the Colstrip associated power lines.

The lack of a coherent overall plan from the beginning has led to BPA being harassed by the citizens and landowners along the ever-shifting routes and being challenged in court for clear violations of federal and state law. In addition, time and money have been wasted in the preparation of several piecemeal documents such as this Garrison-Spokane DEIS. A coherent plan at the beginning of this mess, instead of an unplanned, segmented approach would have satisfied the legal requirments. A clear plan, rather than a fuzzy statement of ill-defined "needs" would also have been of benefit in gaining much needed public acceptance.

## Re-evaluation of Need for the Transmission Facilities Project

According to the BPA, this transmission project has a dual need: 1) to integrate and transmit additional electric power supplied by Colstrip generating units; and 2) to maintain the electrical reliability and stability of the Federal Columbia River Power System.

The BPA's justification is that under the "no action" alternative only part of Colstrip output could be transmitted, and then only over unreinforced system which has less reliability. If this were allowed, the BPA would not be meeting its mission of insuring an adequate and reliable power supply to the Northwest. 2

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We do not accept the BPA's literal definition of "no action" which would mean doing nothing at all. We agree this would violate the Western System Coordinating Council's criteria for power system design and performance. We recommend instead that "no action" should mean putting the millions of dollars authorized for this project into a comprehensive conservation plan. The basis for this recommendation is a study done for BPA in 1977 which concluded that with relatively insignificant conservation measures (eg. turning air conditioning from 70° to 75° in the summer) and the establishment of conservation oriented building codes for new residential and commercial structures, Colstrips 3 and 4 (along with every other power plant not in construction at the time of that study) would not be needed to meet the power requirements of the Northwest through 1995.

The efficacy of this strategy is supported by the fact that the personal conservation measures adopted by millions of Americans over the past 18 months resulted in a decrease in U.S. energy consumption at all levels. Tax credits were, for the most part, the only external incentive for this conservation. The major impetus was a recognized need by the home owner or building proprietor to protect him or herself from the probability of significant long term increases in the cost of energy.

The decreased energy needs of this region have already caused the cancellation of several nuclear projects, and the delayed activation of Colstrip #4. As the power companies have indicated with these drastic expensive actions, load requirements can be met either by increasing generating capacity OR decreasing consumption. It has become increasingly obvious that consumers have opted for decreasing personal and business consumption. It is time that BPA's 4

planning reflects these changing consumption patterns, and its policies begin to enhance the conservation strategy for meeting load requirements.

The benefits of the transmission project listed by the BPA, such as the stimulus of new jobs and greater system reliability, would be met and exceeded by re-routing project funds toward increased conservation. The additional jobs in the construction, manufacturing, and service industries, further more, would be more evenly distributed and more permanent in nature than the temporary construction jobs and the few permanent operational and maintenance positions required by this project.

The Bunker Hill Mine in Kellogg, Idaho, for the past ten years was a marginally profitable operation. The higher utility rates demanded by this project would have further diminished Bunker Hill's chance of survival. Even without these higher rates, that 2100 employee operation will not re-open, although the draft EIS uses this as further justification for the project. Similarly, the WPPS nuclear plants were economically viable only if the power they supplied could be marketed at near current rates. The forecast of consumer rate hikes of 20-50% pushed these projects into the red ink.

In light of the very different economic climate now being forecast for the 1980's, and the proven elasticity of consumer energy demand based on price, the need for this entire transmission project must be re-evaluated before costly and unnecessary transmission facilities are constructed. The draft EIS forecasts consumption growth rates of better than 3.83% through 1985, with a gradual decline later in the decade to the 2.5% level. Even without conservation incentives, these figures are unreasonably high, as BPA only recently admitted. With a strong conservation

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effort, these projected increases could become decreases, and the conservation promotion effort would require significantly fewer dollars than increasing generating and transmission capacaties.

# The Establishment of an Energy Corridor

The draft EIS virtually ignores this very important issue. The abstract says the project will "both create new right-of-way and expand existing right-of-way!" It glosses over the problem by suggesting that there will be less impact the next time transmission facilities are added. Furthermore, it glibly states that these additional impacts will be outweighed by the additional power provided (Section IV, pp. 5-6). In all, about two pages of the entire EIS were devoted to this energy corridor question. In section IV, pp.5-6, however, the real significance of the issue is clarified in two sentences. It is conceded that there are not very many routes through this area of the Northern Rockies and "it is somewhat more likely that a future line through this geographical area would follow the route of this proposal." The draft EIS tries to dismiss this concern, however, by stating that no other lines are in the planning during the rest of this decade.

The transparency of this deception is immediately evident in two other sections of the EIS document. First, Section I, page 14 explains that if the Montana Power Company needs additional power for the Missoula area-- a claim which the BPA made continuously during the scoping meetings-- they will almost certainly wheel back to Missoula over the right-of-way created by this project. Secondly, the environmental ranking of the three proposed routes (Table 2.3) shows the preferred Taft route as being the most suited for expansion as an energy corridor. In other words, the BPA is L-HN-3-394

extremely concerned and protective of this expansion option, even though publicly saying that for the immediate future it is not an issue.

There are limited numbers of viable transmission facility routes through the Northern Rockies by BPA's own admission. Yet they insist on creating a new corridor for this project, when an existing route (basically north of the proposed route and through Helena and the Flathead Indian Reservation) was recommended as the "least impact" by a 1979 Interagency Task Force (Federal Interagency Colstrip Transmission Corridor Analysis). It is obvious that BPA is using the need to move electricity from Colstrip 3 and 4 to the west coast to create an entirely new right-of-way which will then be available if and when it may be needed. The economics and the ethics behind this decision are abhorrent.

# Health Effects

At every public meeting citizens have expressed intense fear and concern over short-term and long-term health effects of the proposed 500 KV lines. Despite the overwhelming importance of this issue in the public mind, it is mentioned in an offhand manner as "Electrical and Biological Effects and Studies" in issues outlined on page I-13 of the EIS. Blatant avoidance of this serious topic is apparent by its exclusion from evaluation criteria in the very next paragraph. This in itself is reason for thorough reconsideration of the entire draft EIS.

We cannot understand the reluctance of BPA to face this issue in a forthright manner and excluding it as an evaluation criterion. Health effects (called Biological Effects) are addressed in a sketchy fashion in the BEIS on pp. IV-17 to IV-24. By a judicious definition of "validity", the conclusion is drawn that "no valid evidence indicated <u>6</u>

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a health hazard" (pp. IV-20). On the other hand "most of the reviewers cited in the table also pointed out a need for continual research". It would seem that by any normal scientific standards, the question of health effects is still a very open one. While we can understand the reluctance of BPA to admit this all-too-evident fact, we insist that it should be acknowledged as one of the primary evaluation criteria.

An example of the bias of the DEIS in health/biological matters is shown by the absence of any expertise in human biology in the list of preparers (pp. V-1 ff.). A further example of this bias can be found in the paragraph beginning on page IV-21 and continuing to the top of page IV-22. Here, Swedish studies are said to show reproductive difficulties among power substation workers. Chromosome damage is also mentioned in these results. A Batelle Study among swine and rodents is said to have demonstrated an absence of chromosome damage. Not stated is that these same Batelle studies, at least on swine, have demonstrated the existence of reproductive difficulties, as well as other serious health effects.

Thus the implication of the paragraph is one of contradictory evidence. This has been done by excluding supporting evidence from the same studies. This methodology has been followed throughout the health effects portion of the DEIS. Any decision-making based on such a biased cross section of available research will be challenged in court.

It is clear that the BPA intends to not allow health effects to become an issue. Admitting the possibility of such effects could lead to severe legal repercussions.

## L-HN-3-**394**

# Social and Economic Impacts

Under health effects we have already noted the tendency in this Garrison-Spokane DEIS--as well as other EIS's--to minimize the response to major concerns. Another example of this approach can be found in Appendix D, Social and Economic Considerations. A summary of corridor residents' perceptions on page 2-5 lists seven major concerns including "... concern about transmission lines' effects on property values". Page 3-8 further defined the property devaluation issue. Yet only one paragraph on page 2-17 and a few lines on page 4-14 and 4-17 are devoted to this "major concern". In essence BPA attempts to bypass the concern as "controversial" and "unproven".

The summary list also uses words such as "many respondents", "several owners", "a few landowners". It has been our experience at all the meetings we have attended, spanning a three year period, that the numbers of people expressing concerns about these social and economic impacts were large and usually these concerns were shared unanimously by the attendees. The use of terms such an "many" or "several" or "a few" instead of "nearly all" or "most" could lead the decision makers to underestimate the importance of these concerns. Indeed, there is even some question whether the interviews conducted by Mountain West Research, whose findings were extensively used in Appendix D, are valid. On page 2-20 BPA admits that the sampling process did not conform to the strict requirements of statistical random sampling, and therefore any conclusions on social concerns "..., are not a precise representation of them".

Another example of the unreality of the social evaluation process can be found on pages 4-25 and 4-75. Here the alignation level for the Ninemile Valley area is given as "moderate". In contrast, the Rattlesnake Valley Crossing is given an alignation level of "considerable". This alignation significance level for the Ninemile

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Valley area should be changed to considerable (RA3). Although we have controlled any public display of anger, the citizen comments, questions and statements at the scoping sessions, meetings conducted by Senator Baucus, or the DEIS review meeting, could hardly be termed "moderate" alienation. Local anger at the WPSS fiasco has in itself generated a "considerable" level of alienation. Anyone who attended the Missoula Electric Cooperative Annual Meeting would attest to that fact. Comments such as "If they build them, we'll knock them down" are not made by people "moderately" alienated.

# Preferred Action

1. It is the position of the Valleys Preservation Council that the only alternative for BPA is to pursue the "<u>No Action</u>" alternative. A re-evaluation of need is definitely in order in view of the fact that three out of five nuclear plants under construction on the West Coast have been shut down because of lack of demand. After all, re-evaluation is not something foreign to BPA. The history of BPA's involvement as expressed in the Garrison-Spokane DEIS indicates continued--almost whimsical-- re-evaluations of routes and needs. It is unfortunate that not once was this evaluation process done properly. We believe that an accurate assessment of the current and future needs would mandate that this project by mothballed in favor of a serious conservation program.

2. If the routing alternative which BPA has selected (the Taft plan) is finally chosen, we feel that a route alteration should be made. Segments 10, 145, 143 should be moved further south into the Lolo National Forest and the crossing of the Clark Fork should be made near the rest area west of Alberton. We also feel that segments 140, 138, and 137 should be moved further south to minimize the impacts to the Miller Creek area. These changes would result in fewer visual

# L-HN-3-**394**

impacts, less property devaluation, fewer possible health effects, and less agricultural land would be impacted as more federal land would be involved.

In addition, a clarification needs to be made on what really constitutes the Taft Plan. On pages IV-55 segments of the Taft Plan are listed. Segment 148 (the Ninemile Valley) is not included. Yet in the body of the text, segment 148 is compared and evaluated using the same criteria as applied to the other listed segments of the Taft Plan. If segment 148 is really a part of the Taft Plan, then it must be <u>openly</u> included as a possible component. Not to admit this, can only be interpreted an another act of deception: to hide BPA 's true routing intentions.

All other alternative routes as presented by BPA are unacceptable.

Submitted by: Valleys Preservation Council P.O. Box 141 Huson, Montana 59846 May 26, 1982

L-MS-1-401 L-ms-1- 402 5160 Wildcat Road Fissoula, Hontana 59802 ay 27, 1982 2 She BPA Mr. George Eskridge, Project Information Officer PIA Transmission Coordination Office 1620 Regent F.C. Pox 43?7 Missoula, Montana 59801 Tear Mr. Tskridge: My husband and I would like to have our comments included in the material you are considering in your final deliberations over placement of the Garrison-Spokane section of the PFA power lines. powerline elictric field We are in agreement with the routing of the Taft Plan, providing that placement in populated areas is done so that the line is visible from as few dwellings as We prefer that routing primarily because it avoids going through or within sight of the Rattlesnake Recreation Area and the Rattlesnake Wilderness Area. In addition, we understand from the draft environmental statement that the Taft Han would not involve taking the lines within sight of as many dwellings as would the alternatives, and we consider that an extremely important factor, varticularly in light of recent research indicating possible health hazards to persons living close to lines. Again, Fr. Fskridge, we appreciate the time you have given us in the past year, answering our questions and listening to our concerns. Sincerely, Kurt and Jeanette Ingold montevent mostara. George and reve Steke

nessoula Sat 59803 L-MC-1- 278 -Xoy 27, 1982 L-MC-1-403 Farry Indusor, a brochement from Battelle Horthwest ratorstories, gave a lecture on Story 13, 1982, at the Unionsty of Shorters Conque, on the biological effects of time we feel there tists are very insportant - this should be intered in the EIS regat . Ne are exclosing articles by Keven Sweller of the Musselian that summerized the listure, Please enter these articles in their extension. Since there studies do grove Definite be loginal effects " we feel the transme sizes should not be just in a populated were like miller Creek and Clark Fork Valley the not populated walley in

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possible.

# Research raises powerline safety questions

# By REVIN MILLER of the Milsouffee

Bochemist Latty Anderson, a powerline health-of-tects researcher for Batielle Pacific Marilmeni Laborato-ries in Richland, Wash., cued up a color side to start his

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Missoula, Montana, Friday, May 14, 1982

From page one

# Powerline

rescurses tend to heal more slowly in exposed animals He propie who cared for the animals nor the reseachers who tested them knew which ones had been exposed to electrical fields, said Andernon. The humans could not subconsciously catiovascular function or fertility. He also toid how one Battelle study entered at 1290. compensate for the exposure by treating the exposed and male differentiy.

The most "robust" results of that study, said Anderson, involved an increased sensitivity in the nervous systems of the exposed animals and a strong effect on their pineai dends.

Research results show that the increased nervesensitiv-By stems from a heightened excitability in the synapses. Sysapses are where ne rve impulses jump from one neuron, or niece of nerve, to another.

The exposed animals also showed abnormalities in the activity of the pineal gland, located at the base of the brain. Nonnetimes known as the "third eye," the gland remains something of a mystery, but is thought to be the center of an animai's biological clock, Anderson said.

Researchers saw definite abnormalities in pineal gland activity in the exposed animals, especially at night. But they the best we've got."

He said Battelle's research has also shown that bone

aren't sure what that means, he said

He also told how one Battelle study showed an increase in birth defects in pige cripsed to the electrical field. Dow-ever, he noted that the study may have been contained. by a dysentery outbreak in the pig population. 5. A.

The researchers had to treat the pigs with antibiotics to cure the dysentery, he said. Because there's no ways to be sure the drugs didn't have something to do with the with defects, it's hard to interpret the results. - 17

"There is a potential effect here with birth depict," said Anderson. "That's something that needs to be cleared up, certainly.'

Anderson aknowledged after the jecture that it would have been better to do conclusive research on powerline health effects before the high-voltage lines became's first of American life. But he said the concerns about safety arose after the lines became commonplace. in head a net

"It's kind of an after the fact thing," she said a "BM lit's 1. 65 m at 1990

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L-HN-1- 404 L-HN-1- 287

Box 960 Huson, Montana 59846

MAY 27, 1982

ke: March 1982 Draft EIS Garrison-Spokane 500 Powerlines

To Whom It May Concern:

As residential landowners we would be significantly offected by the proposed Taft Alternative; this proposed route is located within one mile or less of our residences.

In reviewing the March 1982 EIs we have the following comments and questions:

1. In appendix C, Map Volume, the "Visual Alterations: Corridor Impact Map," indicates that our residences would only have a Moderate level of visual impact. Yet in the EIS, pr. IV-61, paragraph 4, the powerlines are referred to as being an everpresent site to the people residing in end traveling through the Frenchtown/ Huson area.

2. The "Hydrology Corridor Impact Map", where the Taft Alternative would cross the Clark Fork River is categorized as having no impact; we would like to sea the specific information which supports this claim. 3. On pr. IV-61, pregraph 4, section "Esthetics," the impact on segment 145 is stated as "the line would cut scross the grain of the land, would be out of scale with its surroundings and would be ever present in the view. Greatest impact would be upon travelers on I-90 and local residents. The transmission line would disrupt the visual integrity of this highly scenic portion of the Clark Fork Valley."The EPA has acknowledged the highly significant esthetic effect in this area, yet in the Mitigation section no mention is made of segment 145. The impact of these poverlines on the real estate value of our lend and homes is not addressed under the Taft Plan pg. IV-62, "Socio-Sconomic Considerations." 4. appendix E considers only two sites for placement of lines underground. It's apparent from attending the BPA public hearings that, if the powerlines are built, people went the lines buried in areas of visual impact. We concur. It also appears as if BPA is adamantly against undergrounding segments of this proposed line because of the high cost involved. The cost breakdown for underground lines in Appendix E is very general and in decur bs. Ve would like to request a specific cost analysis for underground lines.



L - HN - 1 - 404 L - HN - 1 - 287

Box 960 Huson, Montana 59846

In addition, there are other related issues which make us vehemently opposed to this project. We are very distressed by the potential environmental and social impacts of these powerlines in Montana. We feel that these lines will be a pervanent abomination to Montanans. Montanans will be forced to look at these lines; insult is added to injury when we read that BPA is offering no financial compensation to communities or individuals affected by these lines.

BPA has a contract with WPPSS to purchas 100% of the power produced from plants 1 and 2, and 70% of the power from plant 3. When one considers the reduced demand for electrical power, it seems reasonable to question the need for the BPA powerlines. Moreover, upon learning that Puget Sound Power & Light Co., has "pplied to the NRC for permits to construct Skagit/Hanford Nuclear Units 1 & 2, it again makes us doubt the BPA claim of energy need by Northwest users. When one reads comments by Northwest utility experts who, in referring to Northwest power projects, state that the utility industry- not just WPPSSgot in too deep, it reinforces our doubts about the legitimate need for the BPA powerline proposal.

Sincerely, A. Maass Linds A. Maass Theress Thompson



L-HN-1- 404

Box 960 Huson, Montana 59846

Mey 28, 1982

To Whom It May Concern:

Enclosed is a copy of a letter to Senator John Melcher regarding section 503 of the Federal Land Policy and Management Act.

I would like to request that the issue raised in the attached letter be addressed in the final EIS on the proposed 500 KV powerlines.

Sincerely, Lunda a Massa Linda A. Meass

PROPERTY OWNERS Box 960 Huson, Montena 59846 1 8 2, 1972 Dear Senator Metchant In the Federal Land Policy and it a meteor with a bien yes sponsered, section 603 requires that the cullingtation of Fights planary in common shall be required to the state of the state of the probability policies. It is an evaluate of the state of the state of the lend use policies. It is an evaluate of the state of the state of the the mends to the best provided that the state of the state of the land Policy for the state of the state of the state of the state comply with state filter to use the state of the state of the state condition is this later to the state of the state of the state of the state filter to use the state of the state of the state condition is this later to use the state of the state of the state of the state filter to use the state of the state of the state condition is this later to use the state of the state of the state of the state filter to use the state of the condition is the state of #t is distressing the4 the UC-constraints of UC-constraints in the probability of the UC-constraints of UC-constraints in the UC-constraint of UC-constraints in the UC-constraints in the UC-constraint of UC-constraints in the UC-constr of-way. I would appreciate your lagadry late this a disc. ist corder.

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cc: Senator Hax Bancus Congressmen Pit billions Tom Kosten Max Peterson

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L-MC-1-64 L-MC-1-65 M. IT. L-HN-1-276 In atternations should be compared before the first Els. This requires deather deat + +15 . We asked that such GREGORY KENNETT HUSON, MONTANA - comparison be included in the diast dominant. This is only one issue wit ever addressed, only the May 28, 1982 34 in which it is a starry incomplete poor doounent. the deatt EIS is a transit document - inconsistant and , some cases, based on acordance and for derived Mr. George Eskridge Bonneville Power Administration Missoula, Montana 1 de time fact. Dear Mr. Eskridge: the dialitis hereing should have been delayed well These are my comments concerning the proposed Garrison-Spokane 500-KV transmission project. The state decisions on expligned are more. (1) Current law dictates that existing power corridors will be used where feasible. Table 2.3 in the summary states that the Hot while, the hearing and med america - du sing, or they Springs plan is best suited to use existing utility corridors wherever feasible. and have been detrapid to morporate the fundance (2) Some technical aspects are incorrect. Technical agencies of " the state . Now it is therees any to studing factition of the federal government have drastically different ratings than those published in your draft. Maps that are incorrect are erosion susceptibility and some of the geological information. Are there others? The stair's decisions. (3) The Hot Springs plan is referred to as sensitive and congested. This is laughable coming from an agency that runs powerlines six abreast through prime farmland. This is the worst type of self-serving statement. and wear letter suspensed he the say we a find so When BPA wants to run powerlines through an area where there are existing lines, I seriously doubt they are referred to in the same Parting measures a sufficient and gol aresponde terms, i.e., the draft environmental impact statement on Colstrip electric generating units 3 & 4, 500 kilovolt transmission lines and associit requipitates that save a wadagesto measures. ated facilities did not identify that area as sensitive and congested. It is obvious to me that BPA selects the path of least resisa completent regargulated to the solution? Incardible tance and tailors an impact statement to suit their choice, which brings me to another point. sai the part. (4) The Forest Service is currently doing preliminary survey work on the Taft plan and none of the others. Jack Fisher of the Forest Serv-Sugardier put; ice stated at the Frenchtown meeting that this was due to the information being needed to properly evaluate that route, and the other areas did not Van & Allie General

L-HN-1- 276

Mr. George Eskridge May 28, 1982 Page Two

need that because they were sufficiently roaded. That statement does not fit with figures published in the draft.

(5) The Taft plan passes within  $\frac{1}{2}$  mile of fewer houses than does the Hot Springs plan. This statement is misleading because it does not address how many people bought and built homes already within  $\frac{1}{2}$  mile of an existing major powerline. It would be better to identify how many homes not presently impacted would be in the future with each alternative.

(6) If this process of public participation is to be meaningful and not just political wind, please evaluate and address all comments submitted to BPA both oral and written.

In summary, Western Montana does not need or want additional powerlines. Public meetings held in Western Montana demonstrated the people's disfavor for powerlines. These lines will be a visual monstrosity to residents and visitors alike. There is no need to scar more land and disfigure the landscape. If powerlines have to come through, put them in an area where a utility corridor exists. If the BPA is afraid of the political clout of some areas along existing powerlines, don't shove it down the throat of the new few.

If you would care for me to expand on any comments, please contact me.

Sincerely. Gregory Kennett

GK:vlf

May 28, 1982

George Eskridge Projects. Suformation Officer Bonneville Youer Administration

# Mr. Esteridge,

(an writing in objection of choosing another route for your power Lines other than the existing Hot Springs route already in existence.

I am told by your people that all right-of-ways have been bought by you and negotiations are under way to renew leases across reservation land. And, there is also enough room for your new line. Sn the Jaft route, you have implied that you need enough room for possible future lines, and I am sure that this thinking was also present when the existing hot Springs route was acquired.

Now as a business man, for the life of me, 5 cannot understand why you would want to pay for maintenance and construction costs for another separate route. Logically, it would seem that costs could be cut drastically with only one route which is already in existence. This would also ease costs to the rate payer.

"ou say the Jaft route has less environmental impact. How could it? The Not Springs noute is already in existence and people living along it have either bought on had the land when it was constructed. They know it is there and also probably knew that there would be other constructions. 5 do not feel that it is fair to land owners along the Jaft route to have this devaluation of their properties because of some political clout that some people have apparently exerted to keep away the larger power lines. If they had the land before the lines were built, they sold the right-of-ways. If they did not own it until afterwards, they knew very well what they were getting into.

(utting the path for the Jaft route would not only leave an ugly scar across the mountains of western Montanu, but be devastating on the deer and elk population close to the route. The tremendous road network across the mountains of Montanu is already bad enough, why make it worse when there is already an existing route cut?

In the name of God, don't win all of western Montana!

L-MS-1- 6/5 2 - 115 - 1 - 615 May 28, 1982

George Eskridge Bonneville Power Administration Post Office Box 4327 Missoula, Montana 59806

Dear Mr. Eskridge:

I would like to go on record as being opposed to the proposed Garrison-Taft Powerline. through the Miller Creek area.I believe that consumers have made such conserted efforts over the past two years to reduce their energy consumption.<sup>Amb</sup>Building this powerline at this time would be like a slap in the face. I agree that the powerline may be needed at some time, but do not feel that the present data justifies a present need. Nor do I feel that the existing power corridors have been used to their fullest.

Bonneville Power Administration is a large cooperation and I am sure it is difficult to halt plans once in progress. However if these powerlines could be shelved, it would be a statement to consumers that indeed you are receptive to the numerous statements against the building of this line. I would like to see BPA loose its unfavorable reputation of simply forcing lines through without regard to the communities involved. We really need to hear that we have some voice, we are all beginning to feel very helpless to the desires of large powerful coorperations.

I have read all the recent research on the health effects of powerlines and I believe that powerlines must be buried near residential communities. I realize that this adds to the cost of the line but feel this cost is definitely justified.

Please relay these comments to Peter Johnson.

# Sincerely, Margaret A. Banning 6303 Linda Vista

Missoula, Mont 59803

- Balaca Lippund -Barbara L. Bauman Post Office Box 3943

Missoula, Mt. 59806

# 5/27/8Z

BPA Transmission Govil. Off. 1620 Regent PO. Box 9327 Missoula, Mt. 59800 :Villiani Fiell Pt 3, Pex K 11 Huydun lake, Idi 8:8:55



ATTN: Goorge Eskridge

Pear Sir

I though you for the opportunity to conversion the EIS for the proposed Coursion - Spokenie transmission three And I ask you to convey my thinks to Jay Mariette and Pan Bisenios for their beload patience in one working my nomenious inguiries.

- D by first comment is a general comment reparticly the rep-traducent in the EIS of the pretiminery enting alternation through North Table. The Northern write along the eviding right drawy and the surfaces note through locarit Alean second to have been driverised of band. The reasons I was given that the right of any is to revere ord That locard Alean is a period on ender one we doited (rue, but I'm sure other considerations came who play that I chait feel were adequadely adressed in The EIS.
- The EIS concectes the lock of corbinty regording the long form traitly effects of cleating (well I mention though once thought permitty rejuction to the diff) have proven disastrows on the key term, the identication for an always onnes to mind. I understand, its burd to tak into the follow but I do believe that at least a conscious must be reached along researches regarding safety better the answering and for this public is subjected to some "Thing" around which so much controversy exists
- I guestion The need for the power line in fact I question The need for more electric generating

Os a landowner, resident and member of the Snamte County alleance Speed that Branch County a land by a hige power and should not be mared by a hige power line. The B.P.a. should follow the Montana Litting act. I restart the fact that the BPA Bores not have to pay county tages and gall, Montana Sam I am writing to inform you that Detrongy oppose the construction of the 500 K. U. line Until, all health effects are studied and that county readent will have to make up prove as be for now and in the future the May 26, 1982 Г-МХ-1- С 1/ nanemision Condination Office Mr. Leorge Eskulge Bonwelle Power administration Missoula, Montana 59806 this tax losa. P.O. Box 427 1620 Regrent Dear Su adicided the bosts as coming apreximitely texturen subars. Band 17, 9 and 16 and Hern at a point in sec. 15 tring , south east themades Badger M. (for reference this 13 Ч 57 7G •2 y. רויייר 58 O of evere I readise try by remend # (3) is a fight that the terminant from and that its pointy to concern and that the power list possibly induced its present to manifer the import is the possibly induced its present to manifer the import is a point to concern the present to manifer the import is a point to concern the present to the present to a manifer the import is a point of the present to the present to a manifer the concerned to manifer the import is a point of the present to the present to the present to the present to the present the present to t sincery yeu cours i now is would be softweetly disput from the Dispersal transport. to satisfy the Evaluation Gitaria on park I-13 # 1a. "Avoids residential and minibital arrass, and sufficiently capacity in light of the two-thm-experiminance consumption gravith as evidenced by laber 1.1. answerption gravith as evidenced by laber 1.1. The 22 years evered only 2. advanty inverted in ownerption our tool projected and in line lat 8 years that underconsumption bus been inderwhill Maple our affilides base danged, there has appear to e a correlation between the analy environ of 25 and this order consumption. It puly believe for pure cheavish is not as grautices BRA would have us between in TSZNRZWEM and ZwENY. Evolution I would applied see the line own on the world of Mollistar Murin I feel the line described by Awronthe Again thank you of The opportunity to annumb I hypothery with help that you and I disput to unimize the impact other than some visual! . . . . For which I would recommend tower painting and rare in tower placement with uninned clearing.

If the line has to got hrough it should be best on Federal land and stay at least 1/2 mile from all residences. If it has to go through private land, land owners should be paid a fair price or lease for the right of way and any roads. The B.P.Q. must be responsible for any land damage, gates or funces and be held responsible to restore it to the original state. as a resident that may be involved of the Taft route is chosen I feel you have moved the line south for the Drummond people you can move it south of Mapville too The Taft noute would go too close to residence and private land owners. It would be highly visible from many parts of Grante County Until the health effects are known I don't want to live, work or be around it or have any livestock grage or be close to it Until the electricity is needed I feeling time and the time of the Grante County allene has been wasted of there is no need or demand for the electricity why build the line? Yours truly Barbara & Conn

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L-MS-1-( ு

Mr. George Eskridge BPA P.O. Box 4327 Missoula, MT 59806

Dear Mr. Eskridge:

This letter is in response to the Draft Environmental Impact Statement on the Garrison-Spokane 500 kv transmission line. Please include it in the record.

I want to express my strong agreement with your findings that a route through the existing corridor is unacceptable because it would traverse a densely settled residential area; be close to over 40 residences; create noise pollution; have a devastating visual impact both on the surrounding residences and on the valley as a gateway to the Rattlesnake Wilderness Area, especially in conjunction with the existing lines; would cause disruption during construction; would be visible to large numbers of people; and could not possibly serve as a corridor for additional powerlines. I further agree with your findings that a route through the National Recreation Area is unacceptable because construction would endanger the municipal water supply; the line would destroy the recreational value of a heavily used area; the line would greatly diminish the value of the nearby Wilderness area; and it would disturb wildlife.

I want to record my strong protest regarding the fact that the BPA failed to note the visual impact of a line through the existing corridor on the entire northern vista from Missoula; failed to take account of much available research regarding the recreational use, the wildlife, plantlife, and ecology of the NRA; failed to explore the effect of a line through the NRA on aerial fire suppression; failed to give proper and sufficient weight to the impact of a line through the NRA on big game winter range, on water quality, and on high user intensity; and failed to creak and Butler Creek subdivisions.

Thank you for your consideration.

Sincerely,

Name: Lieliel Converter Address: 2411 Kattleanaker Dhl. Misla, Manna 59802

To land owners when the line current I also angest a dequate payment Their land and pryment by b. P.a. in Tours Truck Mary Fage Conn L-MX-1-6-2/ ъ hear of tayer. line spects on The hearth of people and lewedder, area is charen ( which I those it will not be) has not her recenting (unacymen about safety, more it.) and the inconvenie about our area in the E I d. will use Faderal land for a Federal project. & support (with the Granite County alleaver) south of the Tapt Route in this area. This a raile south of Myrull and continued safety, none, manal, higher takes ate, Thus are so many objections to the loag it is now without a huge powerhour Structed be faither from homes and ranch land. Reading your painflett and E. S.d. ace, 1) ou land " " I have one area and state the going through and my were would with the hearth hagade now in gues I adjut the the Dayt Ruite of this not be built, I trust it will not be de that the 500kV parenter could 11)my 26, 1982 ר-WX-1- (י אן Bennelle James alemander ales. Darigenarion Conduction Office question are proved unlong. Pracoule, Mart 59806 ye turge & aludge P. O. S. 4327 1620 Kegent Dear der,

L-CL-1-622 Classical Arabians Welcome Mountain Arabians Home of the quaranteed houses for show, responses or please Rila Faye Professional paintings and drawings to y Landscares and eximals a specially Rile Faye Luniaglan P. B. Dave 134 Elenton, Mortene 59825 mey 20 ro Phone (406) 825.7377 This is written to protest the propried George Eskelige BPA Route that may cross min Clinton mot. The Swartz creek and/or Wallace creek areas are heavely Populated in anaspipored with Several ranches as well. The routes would appear 20 formais in The Schwartz creek area blow, - an and about a mile square, butween the Swart Creek Bridge & the milurankee tracks. This property lines would put two harse lande ant of husening, as mell as attur small agricultural & purals We are 100% against these Band clines on Sarja Lonaine Unnu Hanh

May 28, 1982 George Eskridge Bonneville Power Administration Transmission Coordination PO Box 4327 Missoula, Montana 59806 Dear George, Enclosed please find a May 28, 1982 letter to the editor of the Missoulian. I hereby request that you include this letter in the publication of the final EIS, and that you treat it as a comment on the draft EIS. Thank you very much.

Sincerely,

adele duly

Adele Furby Star Route Hall, Mt. 59837

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# L-MX-1- / く

# L-MX-1-12

Star Route Hall, Mt. 59837 Mty 28, 1982

Mr. Sam Reynolds The Missoulian Missoula, Mt. 59801

Dear Mr. Reynolds,

As I bit down to write this retrer this morning, I imagine the reaction of the reader of the Michoulian, who picks up his or her paper, and thinks, "Oh no, not unother article on the powerline! I'm sick of that \*\*\*\* powerline! " Checking in my file, where l'we been saving most of the Missoulian articles pertaining to the BPA proposed twin 500kv transmission line. and their incompetent attempts to site the line through western Montana, I count fifty-seven articles since last fall. No wonder people are sick of articles on the powerline. But let me remind you of something, readers. If you think that you are sick of the line now, just whit a few years. Wait until construction prews armive or masse, punch roads and erect towers, leaving a jagged swath zigzagging through our state. Once it is mere, we will be looking at it and listening to it and getting electrically sapeed by it every single day for at least the next fifty years. And then we'll have a better idea about what it is really like to be sick of a powerline. After all, we haven't even seen it yet.

Of all of these fifty-seven articles, two of the most recent have been the most important, however. Bo allow me to briefly cummarize their contents, in case you got bored with powerline articles come months back. In "Study finds biological effects in cowerline electrical fields", Kevin Miller reported on the results of a 6-year old study on the biological effects of powerlines, as to be presented in a lecture by Larry Anderson, a biochemist for Battelle Northwest Laboratories. The study powed that "definite L=MX-1-/ス

biological effects" have appeared in theoretory animals exposed to electrical fields like those under 500-ky powerlines. The project showed definite changed in the animals" nervous systems and an increase in the rate of birth defects. The most remarkable thing about this along is that fact that it was funded by none other than the <u>covernment</u> and the <u>power</u> <u>industry</u>! If they can't come up with a study which disproves that there are definite biological effects from exposure to 500 ky line electrical fields, then I guess <u>nobody</u> can!

So.... the cat is out of the bog on the health effects iscue, and the government and power company officials had a hand in the escape. But an even bigger cut was let out of an even bigger bag in Kevin Miller's article, "Why build a powerline now?". Becaute this article, appropriately placed on the Miccoulian's front page, told it like it really is. It explained, utilizing subtes from the government and the power companies, the real reason why this power line is being built. This powerline is not being built because the power to be carried in these lines is needed now or because it will be needed in the near future by electrical users in the northwest. This powerline is being built for the financial benefit of the Montana Power Company stockholders, and for no-one else. It is being built so that the cost of Colstrip 3 and 4 can be put into the Montana Power Commany rate base. That way the Montana Power Company can charge all of its customers for the building of unnecessary cond-generating mower plants. The MPC stockholders will continue to get richer at the expense of the raterayers, and the US government, through its agency the BPA, will help them to do it.

fo, over the cosing years, so we get sicker and sicker of this powertine, and ony for it visually, health-wise, property value-wise, etc., we can also note forward to getting mighty sick of paying for it every month is our power bill. The cause of this illness is our willingness to allow the power industry and the BPA to walk all over us. The cure is for all of us to tell them no, now, and to bet the MPC stockholders pay for their own minuted. Sincerely,

Adele Furby tor House H 11. KL. 59837

# L-MX-3-8

Lee Tavenner Assistant Chairman Granite County Alliance Star Route Hall, Montana 59837 May 28, 1982

Nr. George Eskridge Bonneville Power Administration Transmission Coordination P.O. Box 4327 Missoula, Montana 59806

Dear George:

The following is a list of letters that the Granite County Alliance requests be included in the final EIS:

# Alliance

| 10/12/81         | Adele Furby to George Eskridge                             |
|------------------|--|
| 11/17/81         | Mrs. Carl Cassidy to George Eskridge                       |
| 1/18/82          | Evelena Anderson to George Eskridge (including resolution) |
| 1/ <b>25/</b> 82 | Clayton Herron to George Eskridge                          |
| 2/4/82           | Adele Furby to George Eskridge                             |
| 2/5/82           | George Eskridge to Clayton Herron                          |
| 3/16/82          | George Eskridge to Adele Furby (process)                   |
| 3/22/82          | Lee Tavenner to George Eskridge (EIS information)          |
| 3/25/82          | George Eskridge to Lee Tavenner (EIS information)          |
| 3/25/82          | Lee Tavenner to George Eskridge (hearing location)         |
| 3/29/82          | Lee Tavenner to George Eskridge (EIS information)          |
| 3/30/82          | Lee Tavenner to George Eskridge (process)                  |
| 4/8/82           | George Eskridge to Adele Furby (public meeting approach)   |
| 4/9/82           | George Eskridge to Lee Tavenner (hearing location)         |
| 4/9/82           | George Eskridge to Lee Tavenner (process)                  |
| 4/9/82           | George Eskridge to Lee Tavenner (EIS information)          |
| 5/21/82          | Jerry Frick to Lee Tavenner                                |
| 5/21/82          | Jerry Frick to Lee Tavenner, revised                       |
| 5/28/82          | Lee Tavenner to George Eskridge (letters)                  |
|                  |  |

-continued-

-2-

L-MX-3-8

## Congressional Delegation

1/18/82 Evelena Anderson to John Melcher 1/18/82 Evelena Anderson to Max Baucus 1/18/82 Evelena Anderson to Pat Williams 2/1/82 Pat Williams to George Eskridge 2/19/82 George Eskridge to Pat Williams 2/25/82 Max Baucus to Clayton Herron 3/3/82 Pat Williams to Clayton Herron 3/3/82 Pat Williams to Lee Tavenner and Adele Furby 3/15/82 Adele Furby to Mike Cooney 3/23/82 Adele Furby et al to Max Baucus 3/23/82 Adele Furby et al to John Melcher 3/24/82 John Melcher to Lee Tavenner 3/29/82 George Eskridge to Max Baucus 3/31/82 Mike Cooney to Adele Furby 4/2/82 Adele Furby to Mike Cooney 4/2/82 Pat Williams to Wes Kwarsten 4/12/82 Max Baucus to Lee Tavenner 4/13/82 Wes Kwarsten to Pat Williams 4/16/82 Pat Williams to Adele Furby 4/30/82 John Melcher to Lee Tavenner 5/11/82 George Eskridge to Max Baucus 5/19/82 Mike Cooney to Adele Furby and Lee Tavenner

# U.S. Forest Service

| 1/28/82 | Charles Miller to Forest Supervisor                          |
|---------|--|
| 2/3/82  | Lee Tavenner comments on the Forest ID Team evaluation       |
| 2/4/82  | Adele Furby to Charles Miller (including position statement) |
| 2/11/82 | Lee Tavenner to Howard Challinor                             |
| 2/22/82 | Lee Tavenner to Charles Miller                               |
| 3/5/82  | Beverly Skinner et al to Charles Miller                      |
| 3/11/82 | Adele Furby to Jack Fischer                                  |
| 3/11/82 | Adele Furby to Charles Miller                                |
| 3/11/82 | Adele Furby to Vic Standa                                    |
|         |  |

| 3/12/82 | Charles Miller to Forest Supervisor |
|---------|-------------------------------------|
| 3/15/82 | Lee Tavenner to Charles Miller      |
| 4/8/82  | Adele Furby to Charles Miller       |
| 4/27/82 | Charles Miller to Forest Supervisor |

-3-

Correspondence with BPA should be available in your files. Correspondence with the Porest Service should be available in your files or through the Porest Service as a cooperating agency. Copies of other correspondence is enclosed.

We also request that all other letters regarding the Taft route in the Flint Creek Valley that you received after the Drummond scoping meeting that were not **specifically** included in your scoping summaries be included in the final EIS. Thank you.

> Sincerely, J. J. S. Source F. Lee Tavenner Assistant Chairman Granite County Alliance

Note to readers of the EIS:

Several of the letters listed here by Mr. Tavenner appear elsewhere in this section of the EIS (see index to comment letters). Others directly follow Mr. Tavenner's letter.

When major changes such as divergent routing alternatives arist later in the process, particularly after the studies and the ranking of all routes have been completed and the EIS itself is well into draft stage, CEQ regulations allow for such input to be considered at a particular stage in the process. The responsible Federal agency is directed, by regulation, to consider such changes and to report on all results of such study. This step takes place during the comment process: that is, during the period of time when the completed draft EIS is made available for public review throughout the study area and the country. Regulations agenify the various modes of response an agency must make. To assure you that full and astisfactory response must and will be made. I enclose a copy of the "Response to comments" section from the CEQ regulations.

BPA does fully recognize the seriousness of your interest in the Maxville routings. We also recognize that reviews done by the USFS (Deerlodge) do not fully address the social impacts on private/agricultural land. We are both bound and committed to reviewing those concorns, but we can make no decision on further studies until the draft EIS is reviewed and the extensive studies already completed over the past two and one-half years have received the opportunity for public comment. The public comment period, to begin this month with the mailing of the EIS, will extend until May 28,1982. BPA will hold meetings throughout the study area to receive comments during the month of April and extending into May. We also expect to receive numerous written comments through our Transmission Coordination Office bere in Missoula.

The MEPA (National Environmental Policy Act) process, outlined in our Plan for Environmental Studies, then specifies that we consider and analyse all comments made, so that concerns arising therein may be studied and responded to in the final EIS. It is most important that all concerns be heard before commitments or other decisions are made on any single segment or single concern. Only then can final studies be made, adjustments (if warranted) made, and explanations prepared to cerve as the final EIS. This stage will begin during the summer; the final EIS is not expected out until fall 1982. The Record of Decision, the formal and final choice, cannot take place until 30 days after the Final EIS is insued.

The NEPA process, which assigns certain actions to certain times, may seem cumbersome or formal. It is designed, however, to protect the interests of the public and to ensure that all concerns are given their due weight. BPA would be willing to meet with the Alliance to explain

MAR 16 1982

Ns. Adele Furby, Chairparson Granite County Alliacoe Star Route Hall, MT 59837

ETH

Dar Ms. Purby:

Thank you for your letter of February 4, 1982. It reinforces our understanding of the Granite County Alliance concerns about the proposed Bonneville Power Administration project as it would pass mare Maxville. We are sorry For the delay of this response; it was caused in part by our cagoing meetings on this subject. BPA, as you are aware, has been dealing with the Maxville concerns since summer 1981, when meetings first occurred with landowners and concerned eitisens in the area.

As part of this engoing repease to your concerns, we have discussed the situation with U.S Forest Service representatives and have attended several meetings with USFS personnel to add our information to their evaluations.

We have also held several discussions within and outside EPA, including discussions with Congressional representatives to explain the ELS process through which the agency will deal with suggested alongss in the route alignments already examined in the draft document. This process is discussed below and is more comprehensively covered in the copy of the Plan for Environmental Studies, enclosed for your information.

The process, regulated by the Council on Environmental Quality, provides for full and thorough consideration of all comments and concerns of those within the study area of any given project. Scoping meetings, for instance, must be held throughout the area in the initial stages of study, so that areas meeding attention may be appropriately identified. Such meetings were held in Drummond and Clinton, Montana, among other towns, in May of 1981. Subsequent studies and evaluations were based, in part, on information received through the meetings and comment letters submitted then. 2

the HIS information and to suggest to the Alliende that you might heat do to prepare for the Drommond meeting in April or for written consents on the draft HIS. Due Bisenius, Tens Leader, Jis Hurray, and I could most maily coordinate our schedules to meet next week, if that suits you.

If such a meeting would be belieful, piezes give me a sali as the Mascula office (1-800-332-2821). Thank you for your patience in mailing our reply. I look forward to meeting with 100 again.

Sinceraly,

/5 George E. Eskridge, Project Coundrater Missonia Constitution Drillou

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ool : Barl Reinsel - US75 Charley Hiller - US73

Mr. Mike Cooney Bonoseble Max Baucus' Office

Mr. Pat Duffy Emorable Pat Villians' Office

Mr. Svan Barrett Ecnorable John Melohar's Offics

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beo: J. Frick - KE C. Clerk/L. Bradshaw/R. Eddy - EYJ W. Kwarsten/L. Wilkerson/O. Keasner - KV L. Driessen - ETJ-C A. Stocker - ETJ-21 T. Murray - EVHE Official File - ETJ-21 heo: I. Fick - 20 G. Glack/M. Actionary, R. Yday - 27 M. Konstee/H. Mitkarson/G. Kakatar - 12 T. Maryay/D. Bisanius - FNR G. Brandprintger - OKK Difficial File - FIL-21

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Re. Buse Justiciji Boseradi i John Malebry's Office Brath. Hasinga

Se. Patrick Heighy Honorable Pat Billers' Office Measure Marane Apr11 9, 1982

F. Lee Tavenner, Aseistant Chairman Gramite County Alliance Star Route Rall. Montana 59837

Dear Mr. Tavenner:

Thank you for your letter of March 30 about the Maxville routing and the actiona we plan to take in response to your concerns. I am sorry that we have not explained ourselves clearly enough, and trust that this letter will clear up any misunderstanding.

Here is what we will do: Between now and May 28, we will gather every comment we can on the EIS, through letters and public meetings. This includes all comments on any suggested route alternatives in your area. This also includes information and comments made since February 2, 1982, for reasons explained below.

Then we will sort and categorize comments for response. All comments and responses will appear in the Final EIS. Such responses can include any and all of those listed in the CEQ Regulations.

The alternatives you propose in the Maxville area which have received study and review by the Forest Service as well as BPA will not be studied further at this time. BPA will reserve the decision on studying more alternatives or route adjustments until the review of the draft EIS is completed and information reviewed. This will probably take four to six weeks after the comment period is over. After this BPA along with cooperating agencies will decide if the interagency team will further atudy those suggestions using methods discussed in Appendix A to the EIS. Results of any further evaluation will appear in the Final EIS.

The Final EIS is also open for comment. No final decision can be made on routing until 30 days after the Final EIS is published.

Our course of action is determined by several factors. All comments and suggestions made during scoping are taken into account before and during the analysis and writing, even up through interdisciplinary team meetings to evaluate and rank segments, routes, and plans. These meetings took place last fall, and ended with the final plan ranking meetings on November 3. Extensive review and rewriting of the document enabled us to prepare the "camera-ready" copy of the draft EIS by the end of January. It was sent to the Government Printing Office in Seattle on February 2, 1982. At this point, no further changes--beyond minor typographical errors--could be made. Scoping was closed.

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For this reason, your comments and suggestions will be considered in our next opportunity for response on the record, which is our response to comments on the draft. In this way, every comment can be considered. Although we could not reassemble the interdisciplinary team, evaluate, compare, and rank those varistions suggested this late in the process, we did clearly notify the public of those suggestions in the "Dear Reviewer" letter and map which accompanied every volume of the EIS.

You can resubmit the proposal or comments made between February 2 and March 16, when copies of the EIS were mailed to the public. They will be taken into account in the comment review process. You are welcome to submit additional comments directly on the draft EIS.

It was our understanding from the March 25 meeting that you might want to resubmit copies of past correspondence that you specifically wanted to be treated as EIS comments. Obviously, this certainly is not a requirement but as was discussed could be done to assure you that certain items from the extensive project files will be addressed in the EIS. Obviously, not all letters and correspondence received during the past 1-2 years will be treated as EIS comments.

I am sorry for any misunderstanding in our recent meetings and letters. I trust that this letter has spoken plainly to you and answered your questions and concerns.

Sincerely, ORIGINAL SIGNED BY

GEORGE E. ESKRIDGE

George E. Eskridge Projects Information Officer

J. Montgomery/T. Murray:ah

cc: J. Frick - EH C. Clark/L. Bradshaw/R. Eddy - ET W. Kværsten/L. Wilkerson/O. Kassner - EV T. Murray - EVHE G. Brandenburger - OKK Official File - ETJ-21 EARE.

# MAY 81 1582

Mr. F. Lee Tavenner Ausistant Chuirman Granite County Alliance Star Houte Hull, Montans 53037

Dear Mr. Tavenners

This letter is to confirm the substance of our conversables law? made the sequence of events for work on the Carridom-Spakame Project tale surface.

We are currently still receiving meeting framewright and comments how one with Analysis of comments from letters and transcripts has beyon and with each of it of weeks. As the scalysis continues through key and for the team will begin to study and reagond to the comments, including pressure conterline adjustments such as these suggested by the Granite Cranky Alliew contervine adjustments such as these suggested by the Granite Cranky Alliew contervine adjustments such as these suggested by the Granite Cranky Alliew contervine adjustments such as these suggested by the Granite Cranky Alliew contervine adjustments such as these suggested by the Granite Cranky Alliew contervine adjustments such as these suggested by the Granite Cranky Alliew contervine adjustments such as these suggested by the Granite Cranky Alliew contervine adjustments such as the sum of the comments.

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Low Driessen, tear representative, will content the Oranhies Sourty Alliests in June to review material necessary to evaluate your suggestions. The intersegency, interdisciplinary team will reasonable in July to examine adjusticates in arous of particular concern. Their findings will be incorporated, together with all responses to comments, in the the final EIS. This process acauses full and unsuphful consideration of all public commentary reactived on the durit EIS.

If I can be of further assistance in clarifying the proceeds, please have no brone

Sincerely,

/signed/ Jerry Prick Engineering Managar

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Syne Br. Torenser:

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The are churability shall encoded, wareled to the scheme latters. Inalysis of edgeworks from believe and measuring the bag bagin and will continue but an estimated 4 to 6 works. As the contrast workshows through May and June, the news will begin to study and respond to the convents. Included in this isolate will be assessment of a contasting in the Maxwith avea south of wherehim, as supposed by the Granite Court, Alistance.

ico Drieson, casa representativo, vill context the Granite County Allonce in June to review material necessary to confust your suggestions for a contestica mouth of Kasarila. The informance, indermised lineary measure in June to review material impact Schrammer (200) will incorporate their finituge deversion both a contertion along the original resident mouth of hare the sad a controlles south of Harville an suggested by the Allinace. This process essents full and throughtful consideration of all public concentry related on the Draft Els.

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L-MX-3-8

Granite County Alliance Evelena Anderson Star Route Hall, Montana 59837 January 18, 1982 1/18

Senator John Helcher 27 West Park Butte, Kontana 59701 attn: Evan Barrett

Dear Senator Melcher:

I am writing on behalf of the Granite County Alliance, a group of Granite County citizens, recently formed in response to the BPA's plans to route the twin 500 kV line through our area. Most of us have only recently (within the last month or so) become aware of the possibility that this line would come through here. We wish to make it clear that while we are opposed to the presence of this line anywhere in Granite County, we feel that there is a better route several miles south of Maxville. Our basic reasoning behind this belief is spelled out in the enclosed resolution unanimously adopted by the Granite County Alliance.

We feel that we have a unique situation here in Gramite County in that we have an area that this power line could cross which would be negrly 100" on public ground. Therefore, from a political point of view, we believe that the BFA would be well advised to locate the line in this area where the political opposition would be close to mil. It represents a chance for the BFA to point to an area where it was able to respond to citizens' concerns and locate the line in an essentially uncontroversial area.

We are very interested in having a public meeting in our area in the very near future to discuss this situation with you. Our big real right now is to convince the BPA to seriously consider relocation the southern route south of Maxville, and not merely vive lip service to the idea. The project engineer, Lou Driessen, has indicated that it is too late for this more southerly alternative to be included in the draft EIS, but that it could be included in the final EIS. However, we are suspicious that in reality, the BPA may not be willing to give it their full consideration. Therefore, we appeal to you to help us convince the BPA to respond to the will of the people.

I am also including a map of our area which shows the BPA proposed routes through the Maxville area and have sketched in a rough draft of the area through which we would like to have the line relocated. This draft is to be taken only as an indication of the area which seems suitable, as we have not yet been able to specifically study the area enough, nor had enough engineering dvice to be able to consist ourselves specifically to an exact line. However, we are attempting to do so currently. As you can see from the map,

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there is indeed a dramatic difference between the bPA routings and our own in terms of the amount of private property, ranch land, and the number of residences affected. The extensive lowering and mining roads within our proposed routing should be sufficient for most of the construction which will be necessary. (Many of these routs are not detailed on this map.) The extra length in the line which would be encendered by our route amounts to roughly  $3 - 3\frac{1}{2}$  takes, (This figure is necessarily approximate.) which is less length to be added that which the BPA has proposed adding in preferring the southern route over the already existing route near Drummond.

Please feel free to call or write if you have any questions. We feel confident that it would be worth your while to investigate this situation and to support us in our effort.

Sincerely yours, Evelena Anderson Secretary 1.-MX-3-8

# PETITICK

We'the undersigned residents of Granite County hereby request the Bonneville Power Administration to relocate the proposed southern route of the twin 500 KV powerline so as to cross Flint Creek several miles south of Maxville.

Principal Objections to the powerline being located on the present BPA right-of-way near Drummond are that the route is too close to populated areas, that the route crosses too much agricultural land, and the route crosses private rather than public land. The southern route alternative was drafted in response to these objections, however the southern route as currently located by the BPA has all the same problems as the Drummond route.

 It does not avoid populated areas; instead it passes almost directly over the populated area of Maxville.

(2) It does not avoid private agricultural and timber land between Gold Creek and  $H_a$ rvy Cabin.

- (3) It is not primarily on public land; almost one-half of the line between Gold Creek substation and HarvyCabin is private property.
- Relocating the proposed southern route approximately midway between Maxville and philipsburg would almost entirely eliminate objections one two and three listed above;
- (1) It would avoid essentially all residences.
- (2) It would avoid almost all private agricultural land.
- (3) It would be almost entirely on public land.

Although our proposed route would be slightly longer and somewhat more costly to build,we the people who must live with this line for the remainder of our lives strongly believe that this would be a much smaller <u>real</u> price to Pay. Our proposed more southern routing would offer a <u>real</u> alternative to the Drummond route. This Resolution was unanimously adopted by the members of the Granite County

Alliance at the January 14th meeting;

They are as follows:-

Name Address Adel Furby ( Chairman) Maxville Maxville Lee Tavenner (Asst. Chairman) Hall Evelena Anderson (Secretary) Cordon Foster ( asst. Secretary) Dave Hauptman (Preasurer) Maxville Hall Maxville Corolyn Dennis (asst. Treasurer Sam Dennis Maxville Bill Demnis Maxville Barbara Conn Ha.11 Princeton Leonard J. Connors Sr. Leonard J.Connors Jr. Princiton Drummond Pat Perry Arthur Kolbeck Hall Evan Kolbeck Hall Nike Conn Hall Laura Ledbetter Maxville Hall Rita Conn Maxville Mary Rodgers Maxville Charles H. Dringle Frank Waldbillig Inllipsburg Carl L. Cassidy Maxville Helen Cassidy Maxville Jerry E. Cassidy Maxville Maxville Ray Lucier Wilford J. Johnson Hall Robert Spitzer Maxville Naxville Mames E. Maehl Grace Maehl Maxville Kelly Spitzer Naxville Dale Martin Maxville Randy Martin Maxville J.G. Mercer Haxville Janie Sullivan Drummond Bill Wight Hall Fred Weaver Clinton Albert Boomer Ha**l**l Evelyn Boomer Hall Kieth Graybeal Hall Bill Ohrmann Drummond Jhon Ohrmann Drummond Maxville Helen Konda Judy Hogan Hall Tom Hogan Gold Creek Dan Hauptamn Ha11 Harilyn Dagel Philipsburg Farvin Dagel. Leland Skaw Philipsburg Herb skinner Hall Bev Skinner Hall

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L-MX-3-8

1/18

Granite Gaudy Alliance Svoluma Anderson Jar Route dall, Hontarn 59837 January 19, 1082

Senator Max Baucus U.S. Senate Vashington, D.G. attn: Cale Jackson

Dear Senator Baucus:

I am writing on behalf of the Granite County Alliande, a group of Granite County citizens, secontly forand in response to the Gra's plans to route the twin 500 kV line through our area. Each of us have only recently (within the last month or so) become aware of the possibility that this line would come through here. We wish to ake it clear that while we are opposed to the presence of this line anywhere in Granite County, we feel that there is a better route revenal allow pould faxville. Our basic reasoning behind this belief is spelled out in the enclored resolution unanimously adopted by the Granite County Alliance.

We feel that we have a unique situation here in Granite County in that we have an area that this power line could cross which would be nearly 1005 on public ground. Therefore, from a political point of view, we believe that the BPA would be well advised to locate the line in this area where the political opposition to it would be close to all. It empowers a chance for the BPA to point to an area where it was able to respond to altigens! concerns and locate the line in an essentially unsoftwored a rea.

We are very interested in having a public meeting in our area is the very near future to discuss this situation with you. Our big yoal right now is to convince the BPA to seriously consider relocating the southern route south of Maxville, and not merely give lip service to the idea. The project engineer, Lou Driessen, has indicated that it is too late for this nore southerly alternative to be included in the draft ELS, but that it could be included in the final ELS. However, we are suspicious that is reality, the BPA may not be willing to sive it their full consideration. Therefore, we appeal to you to help us convince the IPA to respond to the will of the people.

I am also including a map of our area which shows the Bid proposed routes through the Maxville area and have sketched in a rough draft of the area through which we would like to have the line relocated. This draft is to be taken only as an indication of the area which seems suitable, as we have not yet been able to study the area specifically count, nor had enough environing advice to be able to specifically consit our selves to an exact line. However, we are attempting to do no currently. An you can eve from the map, L-MX-3-8

there is indeed a dramatic difference between the BPA routings and our own in terms of the amount of private property, ranch land, and the number of residences affected. The extensive system of logging and mining roads within our proposed routing should be sufficient for most of the construction which will be necessary. (Nany of these roads are not detailed on this map.) The extra length in the line which would be engendered by our route amounts to roughly  $3 - 3\frac{1}{2}$  miles, (This figure is necessarily approximate.) which is less length to be added than that which the BPA has proposed adding in preferring the southern route over the already existing route mear Drummond.

Please feel free to call or write if you have any questions. We feel confident that it would be worth your while to investigate this situatio, and to support us in our effort.

Sincerely yours

Exclanate Alison Evelena Anderson Secretary

# 1.--MX-3-8

# PETITION

Worthe undersigned residents of Granite County hereby request the Bonneville Power Administration to relocate the proposed southern route of the twin 500 KV powerline so as to cross Flint Creek several miles south of Maxville.

Frincipal Objections to the powerline being located on the present BFA right-of-way near Drummond are that the route is too close to populated areas, that the route crosses too much agricultural land, and the route crosses private rather than public land. The southern route alternative was drafted in response to these objections, however the southern route as currently located by the BPA has all the same problems as the Drummond route.

(1) It does not avoid populated areas; instead it passes almost directly over the populated area of Haxville.

(2) It does not avoid private agricultural and timber land between Gold Creek and  $H_0$  rvy Cabin.

(3) It is not primarily on public land; almost one-half of the line between Gold Creek substation and HarvyCabin is private property.

Relocating the proposed southern route approximately midway between Maxville and philipsburg would almost entirely eliminate objections one two and three listed above:

- (1) It would avoid essentially all residences.
- (2) It would avoid almost all private agricultural land.
- (3) It would be almost entirely on public land.

Although our proposed route would be slightly longer and semewhat more costly to build, we the people who must live with this line for the remainder of our lives strongly believe that this would be a much smaller <u>real</u> price to pay. Cur proposed more southern routing would offer a <u>real</u> alternative to the Drummond route.

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Alliance at the January 14th mosting;

They are as follows:-

Name Address Adel Furby ( Chairman) Kaxville Lee Tavenner (Asst. Chairman) Marville Evelena Anderson (Secretary) Hall. Gordon Foster ( asst. Secretary) Naxv1312e Dave Haupteun (Ercasurer) Corolyn Dennis (asst. Treasurer Ea33. Maxville Sam Dermis Maxville Bill Degnis Maxvilli Barbara Conn Kalla Beense qua Leonard J. Connors Sr. Leonard J.Connors Jr. Parinablan Pat Perry Drewaana Arthur Kolbeck HE.1.1 Evan Kolbeck Nall. Elke Conn 1.03 Laura Ledbetter Naxville Rita Conn He, CL Hary Rodgers Naxville Charles H. Dringle Excilla Frank Waldbillig ladlipabare Zexville Carl L. Cassidy Helen Cassidy Kernelline Jerry E. Canaldy Naxville Ray Lucier Noxville Wilford J. Johnson Hall Robert Spitzer Kenzville S\_XV113 James E. Hachl Grace Maehl harville Solly Spitzer Maxville Dale Hartin Nexville. Randy hartin Jaxville J.C. Nercor Laxville Janie Sullivan Dronnond Bill Might 82.11 Prod Veavor Cliaton Albert Booger Hall Evelvn Boomer  $E_{0,11}$ Kieth Grayboal Hall 2111 Ohrmann Drummond Jhon Chrmann Drummond Helen Konda Baxville Judy Hogan Kall Tom Hogan Gold Creek Dan Hauptamn Ha.31 Larilyn Dagel Finilipsborg Larvin Dagel\_ Leland Skaw Rail; poburg Herb skinner Hall Bev Skinner Hall

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Please feel free to call or write if you have any questions. We feel confident that it would be worth your while to investigate this situation and to support as in our effort.

Sincerely yours, Exclerca Gradeson Evelena Anderson Secretary

L-MX-3-8

Granite County Alliance Frelena Andersor Star Route Hall, Montana 59837 January 18, 1982

1/18

Representative Pat Williams Western Bank Building Missoula, Montana 59801 attn: Pat Duffy

Dear Representative Williams:

I am writing on behalf of the Granite County Alliance, a group of Granite County citizene, recently formed in response to the BPA's plans to route the twin 500 KV line through our area. Most of us have only recently (within the last month or so) become aware of the possibility that this line would come through here. We wish to make it clear that while we are opposed to the presence of this line anywhere in Granite County, we feel that there is a better route several miles south of Maxille. Our basic reasoning behind this belief is spelled out in the enclosed resolution unanimously adouted by the Granite County Alliance.

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1.-MX-3- 8

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Alliance at the January 14th meeting;

They are as follows:-

Address Name ..... Adel Furby ( Chairman) Maxville Lee Tavenner (Asst. Chairman) Maxville Evelena Anderson (Secretary) Hall Cordon Foster ( asst. Secretary) Dave Hauptman (Treasurer) Maxville Hall Corolyn Dennis (asst. Treasurer Naxville Sam Dennis Maxville Bill Demnis Maxville Barbara Conn Hall Princeton Leonard J. Connors Sr. Princeton Leonard J.Connors Jr. Drummond Pat Perry Arthur Kolbeck Hall Evan Kolbeck Hall Nike Conn Hall Laura Ledbetter Maxville Rita Conn Hall Mary Rodgers Maxville Charles H. Dringle Maxville Frank Waldbillig Philipsburg Carl L. Cassidy Maxville Helen Cassidy Maxville Jerry E. Cassidy Maxville Ray Lucier Maxville Wilford J. Johnson Hall Robert Spitzer Maxville Wames E. Maehl Maxville Grace Maehl Maxville Kelly Spitzer Maxville Dale Hartin Maxville Randy Lartin Maxville J.C. Mercer Haxville Janie Sullivan Drummond Bill Wight Hall Fred Weaver Clinton Hall Albert Boomer Evelyn Boomer Hall Kieth Graybeal Hall Bill Ohrmann Drummond Jhon Ohrmann Drummond Naxville Helen Konda Judy Hogan Hall Tom Hogan Gold Creek Dan Hauptamn Hall Karilyn Dagel Philipsburg Marvin Dagel Leland Skaw Philipsburg Hall Herb skinner Bev Skinner Hall

## L-MX-3-8

Here Willelf B.P.A L-MX-3-8

2/25

Mniled Stales Senate

WASHINGTON. D.C. 20510

February 25, 1982

Mr. Clayton R. Herron Bex 783 Helena, Montana 59624

Dear Mr. Herron:

The Bonneville Power Administration continues to work on siting its power lines. I appreciate your taking the time to become involved in this problem; it has been a long, difficult situation for everyone potentially affected by the lines.

Right now I am awaiting BPA's response to a series of questions I have asked concerning particular local problems along routes West of Garrison. Also, I have written the Comptroller General of the United States with regard to BPA's statements on the costs of burying the lines in some areas. The Comptroller General directs the General Accounting Office, an independent audit and investigative arm of Congress.

As soon as I receive a response to these inquiries, I intend to make a statement in the Congressional Record concerning the status and current activity on the power lines. This statement will include copies of the questions and responses, and I will mail it to you immediately.

I want to do everything possible to make BPA responsive to your needs, and I will need your proposals and ideas to do so. As you know, I strongly support Montana state siting of any lines, but as long as BPA is able to continue, I want to improve its siting process wherever possible.

Sincerely,

Max Buco

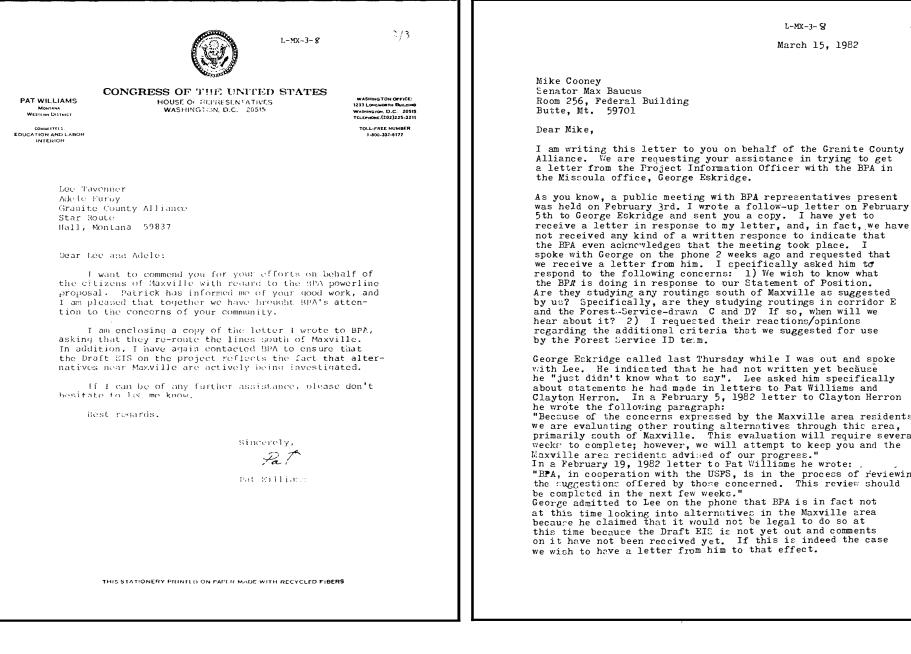
Thank you again for becoming involved.

With best personal regards, I am

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NATION STREAM

3/3 L-MX-3-8 PAT WILLIAMS COMMITTEES MOTITANA EDUCATION AND LADOR WESTERIO ELEMENTARY, SECONDARY AND VOCATIONAL COUCATION MAINERY WHIP AT LADO LABOR STANDARUS CONGRESS OF THE UNITED STATES ASITING TON OFT ICE HOUSE OF REPRESENTATIVES INTERIOR 1912 LONGWINTH BUILDING WASHINGTON, D.C. 20515 WASHINGTON, C.C. 20515 PUBLIC LANDS AND NATIONAL PARKS TELEMONE: (202)225-321 ENERGY AND ENVIRONMENT TOLL-FREENUMBER 1-800- 332-6177 March 3, 1982 Mr. Clayton Herron 2.0. Box 783 Helena, Montana 59624 Dear Mr. Herron: Thank you for contacting me concerning BPA's proposal to route the Colstrip Power lines over Maxville. As you may know, I have asked BPA to reroute its proposal south of Maxville to avoid private land and homes. I have done so because I agree with you that the presently proposed route is indefensible, and better alternatives are available. I understand that the Forest Service I.D. team is now reevaluating the proposal, and is looking at a more southerly route. In addition, I have urged BPA to guarantee that language will be included in the Draft Environmental Impact Statement, which clearly states that alternative routes through Maxville are still being considered. If I can be of any further assistance, please don't hesitate to get in touch. Best regards. Sincerely, Fat Pat Williams RECEIVED MAR \*\* 8 1982 HERRON, MELOY & LLEWELLYN THE RECYCLED FIBERS



3/15

"Because of the concerns expressed by the Maxville area residents, primarily south of Maxville. This evaluation will require several "BPA, in cooperation with the USFS, is in the process of reviewing L-MX-3- 😵

Furthermore, if the BPA is indeed not studying alternatives in the Maxville area at the present time, when are they ,' planning to do so? Is it their policy to not respond to any type of public comment until after the draft EIS is out? If this is the case, why did they not inform us of that at the public meeting, or immediately thereafter in written form, or preferably both?

Our February 5th letter also requested that BPA include language in the draft EIS to guarantee that additional lines are being reviewed in this area. Verbally, George confirms that this is being done. However, we believe that this also is something that he should be willing to assure us of in written form.

You may be getting the impression from the above letter that the membership of the Granite County Alliance feels that the BPA has so far shown itself to be very unresponsive to expressed public concerns. This is very much the case, and I would further add that, as time goes by, the situation does not seem to be improving. It used to be that George would at least answer within a few weeks to our letters, but it has now been over five weeks and I have yet to have a response. So, it is no wonder that our confidence in the BPA is going steadily downhill.

We would surely appreciate any assistance that you can provide in this matter.

Very Truly Yours,

Rolle July

Adele Furby, chaiman Granite County Alliance Star Route Hall, Montana 59837

CC: Pat Duffy Evan Barrett March 23, 1982

Representative Pat Williams 302 West Broadway Miscoula, Montana 59801

Dear Pat,

I am writing this letter to once again thank you for your continued support of the Granite County Alliance and the cit‡zens of the Maxville area in our efforts to convince the Bonneville Power Administration to locate a satisfactory route south of the town of Maxville on their "Taft" alternative of the Garrison-Spokane 500ky transmission line.

Although we were indeed dismayed by Bonneville's preference for the 'laft route and by their not even mentioning the existence of our homes and ranches in the draft EIS released last wask, it was very encouraging to read in the Missoulian that you are still committed to our cause. Pat Duffy has likewise been of great support to us and will surely continue to be so.

Enclosed please find copies of letters to Senators Melcher and Baucus. We are attempting to enlist more active support from them at this time in order to motivate the BPA to find a route south of Maxville soon, rather then waiting until after the public comment period is completed. We are hoping that you can also support us along these lines.

In the meantime, we will be working hard on our preparations to present our came convincingly at the public meeting in late April. We will also continue our efforts to work with representatives of the Forest Service and with Lou Dreissen, BPA project engineer in order to find a route most agreeable with the Forest Service and with local citizens.

Again, thank you for your most welcome support.

Dincerely,

adule Judy\_

Adele Furby, chairman Granite County Alliance

cc: Evan Barrett Mike Cooney Jack Fischer Charley Miller George Eskridge Leo Ferry March 23, 1982

Senator John Melcher U.S. Senate Washington D.C. 20510

Dear Senator Melcher,

We are writing this letter to appeal to you to help us in our continuing effort: to protect our home: and property and that of our neighbors from the BMA 500kv powerline. As you are aware, a public meeting was held in Drummond, Montana on February 4th in which unanimous support was expressed by area residents for our proposal to locate the co-called Taft, route through a corridor approximately two miles south of the town of Maxville. The BPA proposed line goes through the town of Maxville, within one-half mile of 18 residences and a 225 lot platted subdivision. It then proceeds through about eight miles of private ranch land in the west Flint Creek Valley. Our corridor, on the other hand, does not go within one-half mile of any residences and would cross less than two miles of private land. It would add less than five miles to total line length. As mentioned above, our proposal to utilize this corridor through mostly federal land has received almost unanimous support by the citizens of this area.

We have been struggling for over two month: now to motivate the BPA to seriously consider a route south of Maxville, and they are obviously not doing so and have no intention to do so in the future. Up until now, they have been using the excuse that they cannot consider any alternatives in our area until the draft EIS was published. Now they say that they cannot consider any alternatives until after the public meetings and until all public comments have been received. In other cases such as in the siting of the Gold Creek Substation, HPA responded to public pressure prior to the final EIS, so we know that in fact it can be done if they are properly motivated. We feel that they are planning on stonewsling us.

Evan Barret has been of considerable help to us in our dealings with the BPA and the Forest Service on this matter. However, we feel at this time that we are in dire need of give direct aid from our Senators. As you undoubtably know, Representative Pat Williams has made public his support for our cause by writing a letter to BPA (copy herein enclosed) and by making another statement to the Missoulian has week (copy enclosed). This kind of support has been recognized and heartily appreciated by folks in this area. However, it is apparently going to take additional pressure before BPA begins to take us seriously. the type of pressure that we feel you can apply. For, it is obvious from looking at the draft EIS (in which absolutely no mention is made of even the existence of residence; in Maryllic or of ranches in the west valley) and from BPA's inaction in response to previously received public input from this area, that they intend to use any method they can in order to continue to justify an unjustifiable segment through Marville. Is this what we, as voters and taxpayers deserve? We think not, and know that you agree.

Therefore, we feel that now it the time for action on your part. The BPA needs to be anouraged to provide a reasonable, viable routing south of Maxville based upon our projected corridor. This routing alternative should be made public before our public meeting so that public comment can be directed to a reasonable alternative, as well as to the BPA preferred route. This is only logical, since we already had a public meeting in Andres the BPA was informed of our reactions to their current proposed route. This is especially true in light of the fact what the draft EES contains so little information pertaining to our invest. There is still one month until the scheduled public meeting, small time for BPA to develop a new route.

Thank you very much for taking the time to listen to cur conternawe may be a small community, but we, the small took wonders and ranchers are true "grass roots" Montenans, and the amount of alienation already engendered by the callous treatment that we are receiving on the part of the BPA has angered; fructuated, and alienated us all. You, as our elected representative in the Congress stand as our main hope in getting the DPA, a federal agency, to give us a fair shake. As one of us cald the other day after the draft EIS came out, "This is just plain government takeover". Please help us to maintain the standards and ideals of democracy, minority rights, and freedom "guaranteed by our constitution.

Thenking you in advance, we remain,

### Very Truly Yours,

3 enclosures

cc: George Eskridge Charley Miller. Jack Fischer Pat Duffy Evan Barret. Governor Yed Schwingen Leo Berry Nike Coonev March 23, 1982

Senator Max Baucus U.S. Senate Washington D.C. 20510

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Max. many of us well remember when you walked through Maxvill's several years ago on your "walk to Congress", and we are certain that you similarly remember seeing our area, learning about 1, and meeting with the people here. We are hopeful and confident that you will not forget us now that we need you. And we Surely do need you now, for we are beginning to realize in no uncertain terms that the BPA is attempting to "forget" us in all ways possible. We have been struggling for two months 200 to motivate the BPA to seriously consider a route south of Maxville, and they are obviously not doing so and have no intention to do so in the future. Up until now, they have been using the excuse that they cannot consider any alternatives in our area until the draft EI has been published. Now they say that they cannot consider any alternatives until after the public meetings and until all public comments have been received. In other cases such as in the siting of the Gold Creek Substation BPA responded to public pressure prior to the final EIS, so we know that in fact it can be done if they are properly motivated. We feel that they are planning on stonewalling us.

We have been working closely with your aide, Mike Cooney, and We really appreciate all that he has done for us. He has been especially helpful during our continuing efforts to work with

the USFS in order to locate a proposed line south of Maxville which would most adequately mitigate their ecological interests as pertaining to their role as protector of the Deer Lodge National Forest. We also appreciate your effort in directing some of your questions regarding BPA activities to Maxville area issues. However, we feel at this time that we are in dire need of more direct aid from our Senators. As you undoubtably know, Representative Pat Williams has made public his support for our cause by writing a letter to BPA (copy hereby enclosed) and by making another statement to the Missoulian last week (copy enclosed). This kind of support has been recognized and heartily apprepiated by folks in this area. However, it is apparently going to take additional pressure before BPA begins to take us seriously, the type of pressure that we feel you can apply. For, it is obvious from looking at the draft EIS (in which absolutely no mention is made of even the existence of residences in Maxville or of ranched in the west valley) and from BPA's inaction in response to previously received public input from this area, that they intend to use any method they can in order to continue to justify an unjustifiable segment through Maxville. Is this what we, as voters and as taxpayers deserve? We think not, and know that you agree.

Therefore, we feel that <u>now</u> is the time for action on your part. The BPA needs to be encouraged to provide a reasonable, viable routing south of Maxville based upon our proposed corridor. This routing alternative should be made public <u>before</u> our public meeting so that public comment can be directed to a reasonable alternative as well as to the BPA preferred route. This is only logical, since we already had a public meeting in which the BPA was informed of our reactions to their current proposed route. This is especially true in light of the fact that the draft EIS contains so little information pertaining to our area. There is still one month until the scheduled public meeting, ample time for BPA to develop a new route.

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Thanking you in advance, we remain,

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 Kallys Rabert Spitzer
 Kallysburg, ont. 51151 March 23, 1982 letter to Senator Melcher Ber 453 Hall Int. 1.1.1 Brown Day Car Mile Com Jones C. markl albert alsoner Robert Sphere Set March Devel Moune gentra Quelon Monter Bull - staues hely Setu C WITHA I ROCHE BEATH HALL N.L. MARY A. RODGERS - MOXVILLEON Har Ster man will mut mut the start the start man start and start man start man start the start the start man start the start man start the start man start the start man start the start had a long the start had a long mut of the start the start had a long when start had a long mut of the start had a long when start had a long wh He lavenner, Star Route, Hall 599.37 Helen J. Cassily Haxville Strie Phill 598.37 Carl L. Cassily 11, 11, 12, 52858 CHARLES +1 DRINGLE, BOX 382 Star Route #2 <u>51558</u> MANNILE NUME Jenel Gowen MANNULE STRE Ba-bore Conn Hall 1974 5898 Drummer d, Net 13 to Storymill RD and B.11. Den. . Stev RI 35 Terri Villsa A. Strade Name and Address (Print) Note these servicious are the same March 23, 1982 letter to Schotor Welcher . -1110 Pake Hill la Lace 2 run 10 many a. Rolfins. charles X. Wingh John V. Easaly Could of Dennes EVINTHIA J. ROCHE Ruch 8 tax. It alter Maple Signature fand Journ Cange Martin Gall Markin J. J. W. Javenner for Cauch. Bill Junio Endere Com

CARRY THE WAY HAL MT SIBS CARRY THE HALL WITS SIBS CASES THE HALL WITS SARAT Lois Houpiman, Box US, Hall, Mt 59837 an than princen [2x 65, Hall, Mt. Sacrt. Shirley Ghanger Hellint. EVan Li Kolbeek Borsb. Hall, Nont. DON CLOSE BOX IT HALL MONT Deorge-Houge man, Box 223, Hall Mt DORA L. KOLBERK Box 36 HALL, MT. William S. With Tr Hall, Mr. Storal .. Annalse 7. Close Bux 12 Hally NH. Art hot S. Kolbeck Box 36 Hey Mant. John A Conn By 197 Harl Mart Nith E Hauptman Rox 65 Hall Mr LELAND SKAD SKRI HOL MOL CC. Charger Hall, Nt. Owborgh J. Close Box 112, Hall, Mil. Jaroy P. Koon, Hall, MH SAST. éciuruec c. Koori, Nominit. ... Warner Zcok, Hermoille, Mt . Kantlen Kost, Avon, MA' Bare building (doubt ) . Dale witson, Lolo, Mt. Name and Address March 23, 1982 letter to Senator Melcher The Likaupture Ornales 7. Loar Deland L. Clar Doub Clor Jue M. C. aver Sup E. Luphrian dora - V follbech Aquin & K alward S. Kom Even J. Hulbeck then 31 months Signature 1. Com Maur apple 2. Tullet Kalaley Ben Willian Swing ela Ou (1. Sarge Carma M. W. Quart & S in a later 10056 Phy icio hant 51050 Cort & Mar Conse Cours that a build the series In Linsburg Name and Address 225 March 23, 1982 letter to Senator Melcher Lile Edgen P. O. Box 204 Bul Π KSup 188 With ibes of alles Br 310 BX 552 MUT NEBR ן ק O'Burn 12 Jan 11 Loy C lare africe. Kult Hillen

-6-March 23, 1982 letter to Senator Melcher Name and Address (Print) Signature March 23, 1982 letter to Senator Melcher Kim Lorango Star Rfth Manuelle, Mt. tim harango Name and Address (Printed) Signature RON SKINNER Hall, MONTANA 59858 Bill Haney having of solumer Ber Skinner, DRAWER A. HALE, HT. Bill HANEY P.O.Box 711 Callene Conn Pretrati - DARLENe CONN, Box 197, HALL, Mt. 59837 PHilipsBURG MT 59858 STAR RT 2 Hendrick Branchien J Hendrick Box 225 Hall With I stylic Strand Maxville, Mt 59858 Randy marks Egyer Randy muchs BOX 29 HALL MT Becky Muchos You Kenart Mapuille Debi Dimpson BECON, MERLO, BOY 39 Hall, Ht. Joe Kchast, Marville Sankt, Hulypoon, HT. 69137 DEBI SIMPSON BOX 64 HALL, A Charlyw Jacklon Chily & Jamison Ranchy Boy 35 Hallert. Chariya Lackler, Elward M. Radeto Star write 2. Bryla A. Skaw St. R. Hall M Derva (In Space Mulle 11 ontana 59858 Keith braylad KEITH GRAYBERL BOX 94 HALL, HOWTANA Philip E. Jemison Star Route 35 Jyn. Suclixie Lynn Svobuda Bx 69 Holl. M. Drummond, MT 59832 Jim S. Cowom Jim S. Cowin Hall, M7t. Whom Wight Mary W. Jensen Hall Most, West Baran Scott Cowan Hall Most, Endere Genderune Enderna Genderson Zaks, Mt.

L-MX-3-8 March 23, 1982 letter to Senator Melcher United States Senate WASHINGTON, D.C. 20510 Name and Address(Printed) Signature March 24, 1982 aduce P Junh Adde Turni, Slas. Rt., Hall, MH. 59837 EL SIE SKINNEL Hall, Mont 8 9837 Ed James Hall, Mont 59837 Jusur S. Sernes Hall, Mont 59837 John Hosen Hall, Mont 59837 Thomas J. Hosen HALL, Mark 59837 PHISY Buck Hall, Mont 59837 Durght & Houstman Halt, Mont 59837 Elene Stancier Lee Tavenner Star Rt 1 Hall, Montana 59837 Dear Lee: I am sorry that I was unable to personally attend the meeting the Granite Alliance had with BPA and the Forest Service. As you know, Evan Barret, my Field Assistant from Butte attended and expressed my concerns about the proposed power line siting being done by the BPA and other federal agencies. I believe that projects like this should be under the State's Facility Siting Act. That issue is currently being considered in a federal court case. Common sense dictated that those who live closest to the line location are in the best position to give knowlegable guidance to the agencies on the best place to put it in their areas. That is why I have insisted that the Forest Service, BPA, and BLM work closely with local residents such as yourself to insure that the best possible line location is selected. I believe that Bonneville should be required to make payments in lieu of taxes to counties where their power line is constructed. I will continue to work in the Senate to make that change in the law. In the meantime, the Northwest Power and Planning Act that passed in 1980 allows, but does not require, the BPA to make impact aid payments where BPA activities have impacted an area. I have and will continue to press for payments to affected areas. As Evan has told you, I have asked both BPA and the Forest Service to pay attention to the route recommended by us. I have impressed upon them my belief that the line should avoid the Maxville crossing; that it should avoid private lands; that it should avoid valley lands, especially farmlands: that it should avoid concentrations of livestock. Further. I have asked the Forest Service to add several criteria for their ID team to work with. These criteria would give more consideration to human aspects such as avoiding residences.

3/24

Lee Tavenner March 24, 1982 Page 2

The most important thing for the immediate future is to make sure your voice is heard at the Drummond hearing on the Draft EIS.

In closing, I would like to reiterate what I have consistently said to the BPA, which has often indicated that it did not have time to consider the views of the people on the line location: "The time will be taken to do this thing right, or it will not be done at all."

I look forward to working with you and the alliance and hope to be able to personally meet with you in the near future.

Best regards.

Sincerely.

John Meleher

ET J-21

March 29, 1982

Honorable Max Baucus Butte Field Office Room 256, Federal Building Butte, Montans 59701

Dear Senator Baucus:

Thank you for your letter of March 17 concerning your constituent Adele Furby.

I did receive a letter dated February 4, 1982, from Ms. Furby expressing her appreciation for our attendance and participation at their February 3 meeting. Opon receipt of her letter, I assumed that it was meant as a letter of appreciation and a reiteration in writing of the Granite County Alliance's position as stated the previous evening. I did not conclude that she expected me to answer.

During the week of March 1, while working in Spokane, I received a call from tha Missoula office notifying us that Ms. Furby wished to talk to ms. I returned her call and was questioned as to why I hadn't answered her February 4 letter. I seid that I thought she was just reemphasizing the Alliance's position for the record and was not expecting an answer. She also asked why I hadn't answered the letter ale sent to the U.S. Forest Service with a copy to me. I stated that I could not answer a letter on behalf of the Forest Service and assumed that the copy of the Forest Service letter was for my information only. I did agree to answer her latter addressed to me but asked if she would allow me to wait until I returned to Missoula the next week. She indicated that this would be acceptable. Ms. Furby's letter to me and a copy of her letter to the U.S. Forest Service is enclosed for your information.

Subsequent to my discussion with Ms. Furby, I was notified by our Portland office that there was going to be a Garrison-Spokane project ateering committee meeting held in Missoula March 9 to establish concurrence on the beat way to deal with suggested changes in the Maxville area. It seemed appropriate to delay my response to Ma. Furby until after the steering committee meeting.

The steering committee met as planned on March 9 and was attended by representatives from BPA, USFS, and the State of Montana. It was the agreement of all present that we should not make any commitment to a full I.D. team evaluation of the Maxville situation until we had completed the public comment period on the Draft EIS for the Garrison-Spokane project. There was a concern by the members that it would be outside the EIS process if BPA and the other agencies began an evaluation of alternates not presented in the Draft EIS before the public had a chance to examine and comment on the draft document. The agreement by the steering committee was later concurred with by the Bureau of Land Management representative by phone.

2

The afternoon of March 9 and the day of March 10, I and other BPA staff spent visiting congressional staff in Missoula and Butte to inform them of the process we felt committed to in relation to possible routing changes in the Maxville area. I also discussed these procedures with Carlene Nimlos and Mike Cooney of your staff on March 15 by phone. All of the congressional staff we visited with seemed in agreement with our procedures.

I called Ms. Furby on March 11 to discuss my answer to her letter. She was not at home, but I talked to Lee Tavenner, her husband, and told him that I was preparing an answer to her letter as we had agreed the week before. I stated that I was going to essentially say in the letter that BPA had to go through the public comment process before BPA and the other agencies could decide what action was needed in the Maxville area. I also indicated that in the letter we were going to offer to meet with representatives of the Alliance at their request to review the information presented in the Draft EIS and to explain to them how they should use the EIS to their advantage in preparing comments on the Draft EIS.

I completed the answer to Adele Furby in final form on March 16 and mailed it from Portland on the same date. A copy of my letter to Adele Furby is attached for your information.

I would like to take this opportunity to provide a chronological record of my communication with Adele Furby and/or her husband for your information.

August-September 1981: Prior to September 9, Lee Tavenner visited the Missoula office. Lee stated that he and his wife were looking at some property east of Maxville (Section 10) and wanted to know where the route through Maxville was proposed. I showed him the proposed routing on our office map. The proposed line was north of the property he was negotiating on but was still in view. He wanted to know the possibility of moving the line. I stated I would have to check with our reconnaissance engineer, Lou Driessen, and we would get back to him.

September 9, 1981: The Missoula office called Lee and stated that Lou felt that we could not make a major revision of the line without increasing impacts through that area. November 9, 1981: Sent a letter to Adele Furby acknowledging her letter concerning the Garrison-Spokane 500-kV Transmission Project.

December 1, 1981: Lee Tavenner was in the office from 10 a.m. until about 2 p.m. asking questions concerning the Garrison-Spokane project, the power supply situation in the Pacific Northwest, the need for the Colstrip plants, conservation, power flows, aluminum conservation practices and a host of other associated questions. Gordon Brandenburger of our Kalispell office assisted in responding to some of Lee's questions. Prior to this meeting I had loaned the Missoula office copies of Colstrip documents to Lee for his use in developing background information.

I suggested to Lee during this meeting that if he would like to get a group of Maxville area residents together we would be glad to meet with them and answer questions on the project.

January 19, 1982: I called Lee and encouraged him again to set up a meeting with the Maxville group so that we could answer their questions and provide information about the Garrison-Spokane project. He stated that he wanted to meet with us and the congressional delegation at the same time. I stated that would be fine if it was soon; if not, possibly we could have two meetings--one right away with BPA and another with the congressional staff when their schedule would allow.

(Sometime around this date and before the February 3, 1982 meeting, the Granite County Alliance asked the U.S. Forest Service to evaluate a route approximately midway between Maxville and Philipsburg. BPA representatives were not contacted by Granite County Alliance nor the Forest Service concerning their alternatives.)

February 3, 1982: BPA, USFS and congressional staff representatives attended a meeting in Drummond conducted by the Granite County Alliance to discuss routing of the line through the Maxville area. Charles Miller, USFS, discussed the USFS evaluation of routing alternatives south of Maxville.

Tim Murray of BPA emphasized in answer to questions by the Alliance that we (BPA) would review information by the Alliance in deciding what action to take in relation to Maxville routing. Mr. Murray also emphasized the importance of the comment period following release of the Draft EIS in relation to possible changes in Maxville routing.

Mr. Murray stated that because the draft was already in the final stages BPA would enclose a cover letter with the draft discussing routing issues in the Maxville area.

I trust this letter provides the information requested in your letter of March 17.

3

If I can be of further assistance, please do not hesitate to contact me at our Missoula office.

Sincerely,

ORIGINAL SIGNED BY GEORGE E. ESKRIDGE George E. Eskridge Projects Information Officer

3 Enclosures

CE/BPA:GEEskridge:ah

cc: CE/BPA-AC D. Schausten - AE J. Frick - EH C. Clark/L. Bradshaw/R. Eddy - ET W. Kvarsten - EV T. Murray - EVHE G. Brandenburger - OKK Official File - ETJ-21 **United States Senate** 

L-MX-3-8

3/3/ MAX BAUCUS Montana

Washington, D.C. 20510 (202) 224-2651

Montana Toll Free No (1) 800-332-6106

Committees

Finance

Judiciary Small Business

Environment and Public Works

March 31, 1982

Ms. Adele Furby Star Route Hall, MOntana 59851

Dear Adele:

Senator Baucus received a response to the inquiry he made on your behalf. Enclosed please find the letter from the Bonneville Power Administration.

Please review this letter and contact me should you have questions or comments regarding the contents.

I received the letter to Senator Baucus, dated March 23, and appreciate your keeping me informed of your efforts. As soon as this office receives further information we will be back in touch with you.

Again, thanks for staying in touch.

-Sincerely, Ville

Mike Cooney Staff Assistant Room 256, Federal Bldg. Butte, Montana 59701

enclosure

Billings 657-6790 Bozeman 586-6104 Butte 782-8700 Great Falls 761-1574 Helena

449-5480

Missoula 728-2043

4/2.

April 2, 1982

Mike Cooney Senator Max Baucus Room 256, Federal Building Butte, Mt. 59701

Dear Mike,

Thank you for your letter of March 31 which accompanied a copy of a letter Max received from George Eskridge, dated March 29. This letter contains many statements which I consider to be either innaccurate, misleading, or downright untrue. Therefore, in order to set the record straight, I will list below the errors as I see them.

Faragraph 3: I did not request an answer from George on behalf of the Forest Service. I requested that he state what BPA's opinion was regarding the suggested new criteria which were described in the Alliance letter to the Forest Service.

Paragraph five: This is the first notification or knowledge we have ever had regarding a steering committee meeting on March ninth

Paragraph 6: After inquiring about possible conversations with BFA personnel with yourself, Evan Barrett, and Pat Duffy, I am convinced that the primary thrust of these conversations on March 9, 10, and March 15 with the congressional aides was not to inform the aides of the steering committee decision that BFA should not make any commitment to a full ID teem evaluation of the Maxville situation until the public comment period was over. Rather, all aides stated that the primary concern expressed by BFA was to make sure that all of the comments and responses were "within the EIS process".

Paragraph 9: During the September 9 meeting with Lee, the main question regarding "the possibility of moving the line" was not so vague and general. Specifically, since we had indicated our intention to build both our home and barn very near the northern boundary of our property, and since at that time BPA maps indicated that the line would go 1 mile north of that line, Lee asked what the chances were that the line would be moved to the south, thus coming even closer to our homesite. L-MX-3-8

Paragraph 10: The September phone call mentioned was when George called to assure Lee that the line would not be moved to the south, and that an changes that would be made in the line would be in the northerly direction. This turned out, in retrospect, to be untrue, as the next map we saw, and the most recent BPA map we have had a chance to see, indicates that the line has already been moved between one-eighth of a mile and one-quarter of a mile south, now coming only a few hundred yards from our homesite. At that location BFA indicates the intention to install a tower.

Paragraph 15: The Granite County Alliance did not ask the USFS to evaluate a route approximately midway between Maxville and Philipsburg. This is a complete falsehood.

Enclosed please also find a March 30 letter written to George Eskridge bỹ Lee on behalf of the Alliance. It outlines the major points of disagreement that we have with Bonneville regarding their interpretation of the EIS process. We are hoping that Max will concur with our interpretation and will be able to encourage BPA to utilize the EIS process properly.

Again, thanks for your help

Sincerely,

abell Judy

Adele Furby, chairman Granite County Alliance

cc: George Eskridge Pat Duffy Evan Barrett

4/12

# United States Senate

WASHINGTON. D.C. 20510

April 12, 1982

Mr. Lee Tavenner Star Route Hall, Montana 59837

Dear Mr. Tavenner:

Thank you for signing the letter sent to me concerning problems in your area with the Bonneville Power Administration's transmission line.

As you know, my staff and I have been working with the Granite County Alliance and other groups concerning the problems mentioned in your letter. I am very concerned about the reports I have had that BPA is not being responsive to local residents' recommendations.

I have informed BPA that J expect it to use the current comment period to respond seriously to proposals of people in the Maxville-Hall area. This means that BPA must do more than explain its opinions and receive comment; BPA must show some flexibility and change its plans as necessary to meet local needs.

As you can guess, BPA continues to assure me that it intends to be fully responsive. The only way that I can insure that this is true is to work on each problem and idea on a case-by-case basis. I have instructed my staff in Washington and Montana to do just this.

I appreciate your taking the time to sign the letter. I am enclosing a copy of a recent statement I made in the <u>Congressional Record</u> concerning line siting problems in case you have not received a copy by this time.

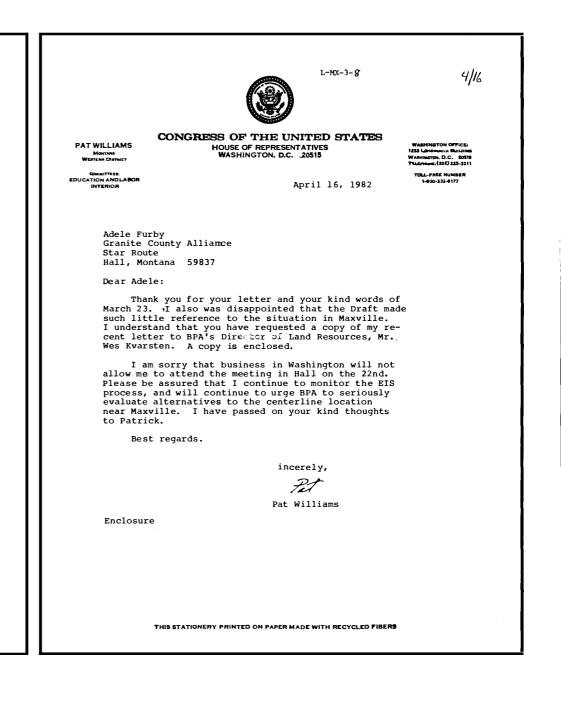
With best personal regards, I am

Sincerely,

Enclosure

cc: George Eskridge, BPA

May Burn



VI-277

4/30

United States Senate

WASHINGTON D.C. 2000

April 30, 1982

Lee Tavenner Star Route Hall, Montana 59837

Dear Lee:

Thanks for letting me know of your opposition to the Bonneville Power Administration plans to locate their high-voltage powerline near the Maxville community.

After reviewing their EIS and your comments. I find I agree that their plan is unsatisfactory. Accordingly, I want to make sure some other alternatives are examined. Since Congress has no right of approval in this instance, the best way I know of to put pressure on the BPA is to hold approval of their right-of-way on federal lands in abeyance until additional considerations are made.

I'm enclosing a copy of the letter I sent to the Chief of the Forest Service for this very purpose. I intend to be especially adamant about the points regarding nearby residential areas and good cropland. I hope we can convince BPA of what I've been telling Montanans: There's time enough to do this right or it won't be done at all.

Best regards.

Sincerely,

Enclosure

John Meleher

ETJ-21

May 11, 1982

Bonorable Max Baucus Butte Field Office Federal Building, Room 256 Butta, Montana 59701

Dear Senator Baucus:

Theak you for your April 13, 1982, letter concerning your constituent Adele Furby's response to information I had previously provided your office.

My response is addressed by paragraph number as outlined in Ms. Furby'a letter of April 2, 1982, to Mike Cooney of your Butte office.

<u>Paragraph 3</u>: Apparently I misunderstood Ms. Furby's request during our phone conversation of the week of March 1. I interpreted her request to mean my answering the U.S. Forest Service (USFS) letter; not to provide a statement of Bounsville Power Administration's opinion on the USFS criteris used or to be used in evaluating routing alternatives in the Marville area.

Paragraph 5: The Carrison-Spokane project steering committee is a combined Faderal/State agency working committee eatablished to: 1) coordinate agency efforts in the EIS process, 2) resolve common agency concerns, 3) review the environmental studies, and 4) maintain open communication between the agencies during the EIS process. The steering committee meetings are in-house working seessions and as such are not advertised to the public.

<u>Paragraph 6</u>: The primary reason for the meetings between Bonneville Power Administration (BPA) personnel and congressional field ataff on March 9, 10, and 15 was twofold: 1) to make the field ataff aware of the steering committee's decision on how best to address potential changes in routing, especially the Maxville situation; and 2) to advise the field representatives of the draft public involvement plan following release of the Draft BIS.

<u>Paragraphs 9 and 10</u>: Annette Marris of our Missoula office called Lee in reference to possible changes in the Maxville area. Based on information received from Low Driessen, our reconnaissance enginear, she indicated that the line would <u>probably not</u> be moved farther south in that area. Based on concerns expressed by another landowner in the area, Lou has recently changed the centerline alighment in that area. This recent alignment does bring the line closer to the Tavenner property. Paragraph 15: Based on conversations between BPA and USFS personnel, it was wy understanding that the Alliance had originally asked that a route approximataly midway between Maxville and Philipsburg be evaluated. In your letter to the BPA Administrator dated January 22, it was stated that local residents in the Maxville area suggested BPA study a route approximately midway between Maxville and Philipsburg. It may be that this was not a suggestion by the Alliance, but rather a suggestion proposed by local residents and assumed by various USFS and BPA personnel to be a suggestion originating from the Alliance.

I trust this latter provides the information requested in your letter of April 13, 1982.

If I can be of further essistance, please do not besitate to contact me at our Missouls office.

Sincerely,

Character Cover St Groker L EnglaGE George L. Eskridge Projects Information Officer 2

GEEskridge:ah

cc: (w/ 4/13/82 letter from BauCus) CE/BPA-AC D. Schausten - AE J. Frick - EH C. Clark/L. Bradshaw/R. Eddy - ET W. Kvarsten - EV T. Murray - EVHE G. Brandenburger - OKK Official Pile - ETJ-21

United States Senate MAX BAUCUS Montana 5/19 L-MX-3-8 Washington, D.C. 20510 (202) 224-2651 May 19, 1982 Montana Toll Free No. (1) 800-332-6106 Adele Furby Lee Tavenner Granite County Alliance Star Route Hall, Montana 59837 Dear Adele and Lee: I have received a response to one of the recent inquiries Senator Baucus made on your behalf. I have enclosed the letter from George Eskridge. Please review this information. As always, should yoū have any questions or comments, please get back in touch with me at the Butte Field Office. Committees I must apologize that a representative from Environment and our office was not at the meeting you had with Jerry Public Works Frick in Missoula. I understand that Pat Duffy was Finance there and I have discussed the meeting with both Pat Judiciary and Jerry. I found out just yesterday that our Small Business Missoula staff person was unable to be there. If you would like to discuss any aspects of the meeting I would be happy to call or set up an appointment if you should be in the Butte area. I hope this information is helpful and please do not hesitate to call or stop by the Butte Office. sincercly, hule low Mike Coonev Staff Assistant Billings 657-6790 Enclosure Bozeman 586-6104 Butte 782-8700 Great Falls 761-1574 Helena 449-5480

Missoula 728-2043

| United States Forest File   | Forest Supervisor  | Page -2-   |
|---|--|--|
| Agriculture 50<br>Rentry To 1950 Foreat Service National Environmental Policy Act Data January 28, 1982<br>2720 Special Uses<br>Carrison-Spokane 500 KV Transmission Line   | <ol> <li>The line along Black Pine Ridge w<br/>skyline. Some visual contrast wo<br/>of Gold Creek.</li> <li>Lack of existing roads would maxi<br/>disturbance from about Gold Creek</li> <li>A road system could be developed<br/>facilitate access to the transmis<br/>lands.</li> </ol>  | uld be experienced in the area<br>mize the amount of new soil<br>to Black Pine Ridge,<br>in the area from Gold Creek to  |
| <ul> <li>* Forest Supervisor</li> <li>The Forest I.D. Team met on January 25, 1982, to consider additional alignments for a portion of the Garrison-Spokane 500 KV transmission line. The portion studied was in the area of the Flint Valley and Maxville.</li> <li>A request by people in the Maxville area prompted the consideration of additional routes. Those routes studied were between Jones Mountain and Eight Mile Creek.</li> <li>The people in Maxville had indicated a corridor extending between Jones Mountain and Strawberry Mountain as a possible location for a new alignment. Their reasons for requesting a new alignment were as follows:         <ol> <li>Avoid the populated area of Maxville.</li> <li>Flace more of the alignment on other than private lands.</li> <li>Avoid agricultural and timber land between Gold Creek and Harvey Cabin.</li> <li>Lines considered by the I.D. Team are shown on the enclosed map. A copy of the petition is also enclosed.</li> </ol> </li> <li>Gilbert Vigil Movard challinor Harve State Multimestion of the four alignments shown on the map, some potential problema were identified.</li> <li>Line A - This alignment was determined along with Lou Driessen of PA during carlier studies.</li> <li>Line A - This alignment was determined along with Lou Driessen of the line would breach elk security areas from Gold Creek to Boulder Creek, especially along Eurek Ridge and Black Pine Ridge.</li> <li>Water quality standards could be exceeded at the Head of Little Gond Creek to Boulder Creek, the creesing of Sware Gold, Creek to Boulder Creek, especially construction and would be visible from many different areas.</li> </ul> | <ul> <li>Line C - General comments: <ol> <li>As with all alignments in the are road construction would cause the ened until the roads stabilized a</li> <li>New access roads to towers from S Creek would improve access to the</li> </ol> </li> <li>Line D - This alignment crosses some steep topo construction of access roads difficult</li> <li>Other alignments were projected, and then dropped difficult topography, such as the west slopes of both sides of Flint Creek, Smart Creek, Hendersoo along Maywood Ridge, and the mouth of Gird Creek impacts to the Forest resources caused alignment dropped from further study.</li> <li>The four alignments shown on the enclosed map we "Hust Criteria" developed by the I.D. Team at eas are those Forest concerns that must be met and/od uring location of a transmission line.</li> <li>The "Hust Criteria" are as follows: <ol> <li>The centerline must protect the special will range and security areas.</li> <li>The centerline must maintain the current we debeause of tower placement and/or road I.</li> <li>The centerline location must use landscape paces of the facilities.</li> <li>The centerline location must use landscape paces of the facilities.</li> <li>The centerline location must protect allotm improvement.</li> <li>The centerline location must protect allotm improvement.</li> </ol> </li> <li>The centerline location must minimize areas in the landscape.</li> <li>The centerline location must avoid the high li. The centerline location must avoid the high li. The centerline location must avoid the high li. The centerline location must minimize impace in the landscape in the centerline location must avoid the high li. The centerline location must avoid the hi</li></ul> | current water quality to be less-<br>nd were revegetated.<br>Unrise Mountain to Eight-Mile<br>National Forest lands.<br>graphy, making the location and<br>the form further study because of<br>Eureka Ridge, Horseshoe Basin,<br>on Mountain, and the slump areas<br>. Steep topography and associated<br>is through these areas to be<br>the evaluated in terms of the<br>writer meetings. The "Must Criteria"<br>or be capable of being mitigated |

Forest Supervise

Page -3-

lowest score, and (>) peing the highest score. The rankings of the eight team members were then totaled for each criteria and then for each route. The higher the total score, the better the alignment met the criteria developed.

### MUST CRITERIA RANKINGS

| Must<br>Criteria | Line | Line   | Line | Line |
|------------------|------|--------|------|------|
| No.              | A    | В      | , C  | D    |
| 1                | 25   | 9      | 27   | 32   |
| 2                | 33   | 10     | 31   | 23   |
| 3                | 34   | 11     | 31   | 23   |
| 4                | 10   | 38     | 20   | 27   |
| 5                | 38   | 8      | 34   | 23   |
| 6                | 37   | 9      | 33   | 22   |
| 7                | 26   | 23     | 24   | 25   |
| 8                | 39   | 9      | 31   | 23   |
| 9                | 40   | 14     | 31   | 25   |
| 10               | . 33 | 8      | 27   | 19   |
| 11               | 8    | 37     | 20   | 22   |
| TOTAL<br>RANKING |      | ······ |      |      |
| SCORE            | 323  | 176    | 309  | 264  |

Recommendation: Based on the "Total Ranking Score", it is recommended by the I.D. Team as follows:

- 1. Line A is the preferred alignment, should the "South Route" be selected upon completion of the Environmental Impact Statement.
- 2. Line C is acceptable as an alternative to Line A.
- Line D is minimally acceptable as an alternative to Line A. Line & does meet much of the criteria identified by the Maxville people. 3.

4. Line B is unacceptable.

#### Forest Superviso:

Page -4-

This recommendation will be presented to the Philipsburg District range permittees on January 28, 1982.

CHARLES W. MILLER Project Coordinator

Enclosures (2)

cc: Dan Heinz Joel Marshik Ron Hanson Gene Alden I.D. Team Members Evan Barrett

# Additional Data

| Line | Total<br>Segment<br>Length | Difference<br>in<br>Length from A. | Difference '<br>in<br>Cost | Amount<br>Private<br>Land |
|------|----------------------------|------------------------------------|----------------------------|---------------------------|
|      | (miles)                    | (miles)                            | (Million \$)               | (miles)                   |
| A    | 31.3                       | -0                                 | -0-                        | 13.0                      |
| B    | 43.8                       | 12.5                               | 11.0                       | 5.4                       |
| с    | 32.3                       | 1.0                                | 0.9                        | 10.4                      |
| D    | 34.2                       | 2.9                                | 2.6                        | 9.8                       |

### PETITION

We the undersigned residents of Granite County hereby request the Bonneville Power Administration to relocate the proposed southern route of the twin 500 KV powerline so as to cross Flint Creek several miles south of Maxville.

Principal Objections to the powerline being located on the present BPA right-of-way near Drummond are that the route is too close to populated areas, that the route crosses too much agricultural land, and the route crosses privaterather than public land. The southern route alternative was drafted in responseto these objections, however the southern route as currently located by the BPA has all the same problems as the Drummond route.

 It does not avoid populated areas; instead it passes almost directly over the populated area of Maxville.

(?) It does not avoid private agricultural and timbor land between Gold Creek and  $H_{\rm a}rvy$  Cabin.

(3) It is not primarily on public land; almost one-half of the line between Gold Greek substation and HarvyCabin is private property.

Relocating the proposed southern route approximately midway between Maxville and philipsburg would almost entirely eliminate objections one two and three listed above:

(1) It would avoid essentially all residences.

(2) It would avoid almost all private agricultural land.

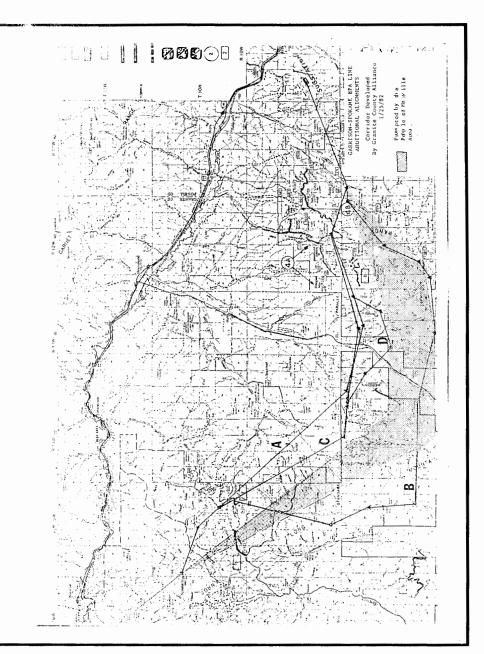
(3) It would be almost entirely on public land.

Although our proposed route would be slightly longer and somewhat more costly to build, we the people who must live with this line for the remainderof our lives strongly believe that this would be a much smaller <u>real</u> price to pay. Our proposed more southern routing would offer a <u>real</u> alternative to the Drummoni route. This Resolution was unanimously adopted by the members of the Granite County

Alliance at the January 14th meeting;

They are as follows:-

| Name a straight                     | Address       | Phone                |
|-------------------------------------|---------------|----------------------|
| Adel Furby ( Chairman)              | Maxville      | 859-3380             |
| Lee Tavenner (Asst. Chairman)       | Maxville      | 859-3380             |
| "Evelena Anderson (Secretary)       | Hall          | 268-3314             |
| Cordon Foster ( asst. Secretary)    | Maxville      | 288-3370             |
| Dave Hauptman (Treasurer)           | Hall          | 288-3469             |
| Corolya Dennis (asst. Treasurer     | Maxville      | 288-3300             |
| Sam Denn:1s                         | Maxville      | 288-330              |
| Bill Deunis                         | Maxville      | 288-3300             |
| Atarbara Conn                       | Hall          | 288-3327             |
| Leonard J. Connors Sr.              | Prispeton     | 200 9921             |
| Leonard J.Connors Jr.               | Princeton     |                      |
| Pat Perry                           | Drummond      | 288-3474             |
| Arthur Kolbeck                      | Hall          |                      |
| Evan Kolbeck                        | Eal2          | 288-3408             |
| Hike Conn                           | Wall          | 285-3394             |
| Laura Ledbetter                     | Maxville      | 288-3370             |
| Rita Conn                           | Hall          | 288-3394             |
| Mary Rodgers                        | Maxv1110      | 859-3368             |
| Charles H. Dringle                  | Maxville      | 859-3368             |
| Frank Waldbillig                    | chilipsburg   | 859~3282             |
| Carl L. Cassidy                     | Maxville      | 859-3349             |
| Helen Jassidy                       | Enville       | 859-324)             |
| Jerry E. Cassidy                    | Maxville      |                      |
| kay Lucier                          | Eaxville      | 859-3349<br>288-3442 |
| All Cord J. Johnson                 | Hall          | 288-3315             |
| Robert Spitzer                      | Maxv303.e     |                      |
| James E. Machl.                     |               | 859-3681<br>Rfp 3335 |
|                                     | "axville      | 859-3325             |
| Shace Mach)                         | axville       | 859-3325             |
| Kolly Spitzer                       | Haxville      | 859-3561             |
| Dale Mariin                         | Faxville      |                      |
| Handy Kartin                        | haxville      |                      |
| . C. Master                         | baxville      |                      |
| Janie Sullivan                      | Drammored     | 288-3818             |
| B111 Kight                          | Kall          | 288-3447             |
| Rued Hearway                        | Olinton       | 825-7356             |
| Albert Booter                       | Hall          | 286-3309             |
| Svelyn Booner                       | Sec.11.       | 288-3309             |
| Hieth Grayboal                      | Hall          | 288-9407             |
| Bill Chrann                         | Drummond      | 268-3319             |
| Jhor: Christian                     | Dreamond      | 288-3319             |
| Holen Konda                         | Maxville      | 859-338+             |
| 13 ady Hogan                        | Hall          | 288-3333             |
| Ton Human                           | Gold Crizek   | 288-3333             |
| l'en Hamptamm                       | lial1         | <sup>888-3469</sup>  |
| harilyn Dagi                        | Phillips burg | 859 39-5+            |
| Wessign Tareli                      |               |                      |
| Arryin Ing <u>el</u><br>Lelani Skiz | Print paberty | 859-3984<br>286-3428 |
| derb ski oar                        | Hall          | 288-3374             |
| lev Skimmer                         | 55. L         | 288-3871             |



# RECEIVED 2/3/82 HAUD DELIVERED By LEE TAVEUUE

Granite County Alliance

tatement of Porition Regarding January 28, 1982 Forest 'ervice I.B. Team Evaluation of Additional Alignments for the Carrison#Spokane 500kv

1. Line (collidor) E is our preferred routing area.

Transmission Line through Maxville Area

- Line C+plus-D could be an acceptable alternative to line E provided come minor adjustments were made. Line C-plus-D does fully meet our major requirement that the line avoid residences.
- 3. Any movement to the north of line C-plus-E would be abculutely unacceptable.
- 4. Line A is unacceptable.
- 5. Line C.1s unacceptable.
- 6. Line B value never premoted by us.

comments on the Porest IS Tessa's evoluation of proposed BFA powerline routes in the Nexville starts

.1. Avoiding refidences is the nost invortant criteria, and should be edded for criteria / 12. Surgerted ratings are line A:8, line B:40, line C:8, and line b:35.

2. Water cuality hould not be listed twice, so criteria #3. Chould be clikinglod.

3. Water sublity and soil diffurbance are directly related and whould coupt as one criteria, so criteria #2 or #8 should be celiminated.

4. Vieuel images hould not be listed twice, so criteria #6 should be eliging tec.

5. Use of non-made fore: t opening should be maximized, but use of non-mal fore: t opening hould be minimized. Because this distinction is not made, criteria #9 should be revised or eliminated.

When the above adjustment to the criteria are made, criteria #3, #6, #8, and #9 are eliminated, and criteria #12 is added. Total ranking cores are:

Line A 181 Line 5 173 Line C 191 Line D 205

Based on the seconds, line D is the environmentally preferred alternative.

Steepns. 5 should not he still to more this tent thin all other criteric put together. Steep terrain i often the least userul area for other burpe c. (cattle, wildlife, recreation, timber production) and therefore steep terrain should not be eliminated from consideration for proposed routes. For this reason, route, that were not considered by the ID from become of steepness should be seen identiced and Studied further. February 4, 1982

Charlie Hiller Project Coordinator ULF FO Box 400, Federal Building Butte, Et. 59703

Deer Charlie.

The Granite County Alliance would like to express its appreciation for your attendance and a reaction of our public meeting on February 3rd. We expectably one encouraged to hear of your willingness to re-evaluate the crittria used as well as possible routings through the Maxville and west valley areas.

Enclosed is a copy of our st tement of vosition as was unanimously paused at the meeting, as well as a mon which delineates corridor "E". As you know, in our view this ones deserves more review as a possible place for the line.

In light of the view cirt. evenes of at the meeting, we would like to suggest that several new criteria be utilized in your furgre evaluation of this area. The e are:

- 1) Avoid reducting property. We have established the principal that & mile from a residence is the minimum acceptable distance.
- avoid view 1 import on ce idential property.
   avoid concentration and describe live teck on private. property.
- 4) Avoid creductive fors or using line on private property.

Along with there proposed reditional criteria, we propose that water suchity and visual issue! on other than re-idential property be each considered as only one criteria instead of two.

If the above elements are utilized in your evaluations, we believe that your conclusions will more adecuately reflect the overall environmental insect in this area, writeularly as it is field by the e citizen the live and work in this area from day to day.

We are looking forw rd to working more cle ely with you in the fusice on this re-evaluation, and feel confident that if "e work together that we can come up with a proposed routing which will be more necessible for all concerned.

incerely.

adde July

ee: Syn Rorret Like Cooney Pat .uffy George Eckridge Vic Stands

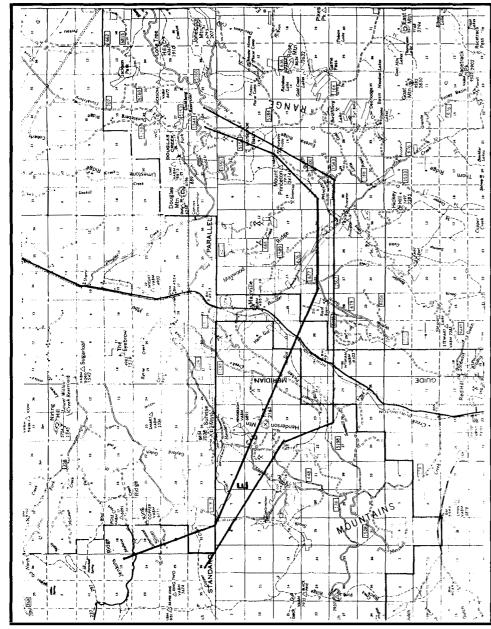
wele Furby, Of man Granice County Alliance

### Granite County Alliance

# tratement of Position

Regarding January 28, 1982 Forest Fervice I.S. Team Evaluation of Additional Alignments for the Garrison#Spokane 500kv Transmission Line through Faxville Area.

- 1. Line (corridor) E is our preferred routing area.
- 2. Line C+plus-D could be an acceptable alternative to line E provided come minor adjustments were made. Line C-plus-D does fully meet our major requirement that the line avoid residences.
- 3. Any movement to the month of line C-plus-F would be abcolutely unacceptable.
- 4. Line A is unnecestable.
- 5. Line C in uncoentable.
- 6. Line B we never creasted by us.



Howard Chellinor Thilipeburg Samer Station Thilipeburg, Sonsena 59858

hear Howard:

Whenk you for meeting with us five Gramite Sounty Allished representatives "ueeday Reb. 9 regarding essioneers with proceed powerline routes and with and 1 - estate evolution criteria. For the take of review, I list one of the principal concerns we discussed with you here:

1. Steep terrain is generally less a cful and less valuable lond and should be fully con isotred for notechine routes.

2. The long range costs of this powerline are huge, and should not be increased to avoid the relatively meller one-time construction costs.

3. Frive to lead on both the east and us to be of the value blogs a major role in all catving one wintering.

4. Fowerline, should be located in sum-and forest openings such as clearcute, but chould evoid netural forest opening such as small parks and mesdows.

5. Shorter-term lead user only in the mid- waker months, uch as short-term catle scraits, is professible for noverlines to land to d for a longer grazing secon or yes-round.

6. Roade do extend onto the ridge couldwe t of Frinceton, and there are numerous roads throughout the rest of corrider E.

7. The powerline is visually hidden the most in consider E.

•. After BFA is through with contruction in the eres, their role will distinct, but the Porest ervice and the level needle will have to manage the difficultie and inconveniences of the line for a very long time to cose. Hence located of the line will help minimize the close-term difficultie.

We feel confident that yes will error — an o concern to the To Jess in more concillat next week's 1 — tess sections. "These concerns are, of course, in a dition to these coulined in our original potition and in a Peb.4 Letter to Charlie Liller,

allel 8 2

February 11, 1982

February 22, 1982

could of which are enclosed. We have that the I: Securit full consideration of the c matters will prove helpful to everyone.

> Linducely, U.C.S. Jurnwer F. Lee Wavenlor a - i dent cheirson Granite County Alliance

ee: Vie Standa Charlie Eiller Even Emret: Fat Duffy Eike Cooney George Eckridge Charlie Miller Project Coordinator U:Fo PO Box 400, Federal Building Butte, Montana 59703

Dear Charlie:

I undertand that the Forest ID Team met February 17 to evaluate some powerline route: in the Maxville area, and that you are in the process of preparing a report from that meeting.

The Granite County Alliance would appreciate an opportunity to review and comment on the report before any final recommendation is made to the forest supervisor or to the Ponneville Power Administration.

Fublic involvement should be an integral part of the evaluation process, and review of the 1D Team's proposed recommendation before the recommendation is finalized is eccential to any meaningful public involvement.



ae istant chairman Granite County Alliance

cc: Evan Barret: Mike Cooney Pat Buffy George Bukrijge

2/23/82-

March 5, 1982

Charlie Biller Project Coordinates USPE No Box 400, Redam in Albeing Butto, Ft. 55762

Serr Chartie,

We are writing this letter to encourting your continuant offorts working with the Germite Scritty Addience to lee te en acceptable routing work of the term of the will for the Germion-D offers 500 by the .

We believe that the car thin continent E to define the by the Granite County tiling a would be the nort appropriate location.

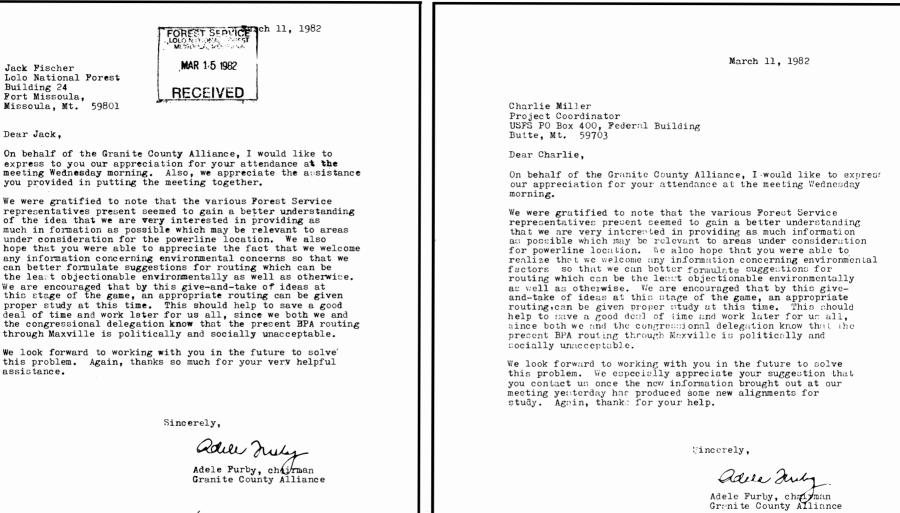
We recognize and associate the fact that the U<sup>i</sup> Fi lb te m developed line C-D in resonance to the st test define of the Granice County drive to keep the line awy from residence. While line C-D is not nearly accordeble corridor h, if the change the Granice County drives is uggesting to a more in it, it would be be out a big incrovement over time.

We are confident shot yes will be able to reasond to our constand and locate a souring scowe of traville which would also be acceptable from your of a of view. Thile we in no way accoto have that we are in the or of locating a line envelope in Granice Causty, we believe that the line heald utilize faders which, and, if we are all withing to constrain a vertice of the best closed of the start.

Very 9 bly Yeuro,

Same Stiniur cc: Like Coorcy ronald E Spenner Du " Ev n barret Pat Burly Vic Ciend John Ge Com Firnk alonen en Jeek Filcher Hendrich Orville - niel Tem Conton (Iyde C Clowson. Riche - Sampoon the interior

Plycein Course Hill Simpor Ayde & Chauseon milela Jacore Juing Flagune hay Trucian, - (more ) Hereins Tela Com I your Lucion And the second star but Cyndre Beck Emil na April 2000 Selend Skow-Valerie Kincert Sport / Shai Miana Cing Mild True go 1 1 1 1 1 E jill cq til Randy Madim Jugeon ? is year Carp ft aswig illum all call - Jelim V Garacia ( in the day site) My hour (assidy Station SAULA, Nobert Intych 2-na Olimana Steel in Mar Manier Cololy G. Serina Harris Madride y Romana March Dame Officiancia Jun frinter Subymar Ol'allar m. Bill & immus Michael ..... Gracele P. During -



cc: Frank Solomonsen Vic Standa

(star Route; Hall, MT 59337)

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|  | SO  |  |  |
|--|---|--|--|
| March 11, 1982   | 2720 Special Uses   |  | March 12, 1982   |
|  | Garrison-Spokane 50   | 00 KV Transmission Line  |  |
| Vic Standa<br>Philipeburg Ranger District<br>Philipsburg,  | Forest Supervisor   |  |  |
| Mt. 59858  | A meeting was held<br>attending:  | in Philipsburg on March 10, 1982,  | with the following people  |
| Dear Vic,  | Name  | Address  | Title  |
| Thank you very much for hosting the meeting yesterday. We<br>feel that it provided a good opportinity for an exchange of<br>idea so that we can all do a better job of solving this<br>powerline dilemnu. Discussions at to pherement of a power<br>line of this magnitude dannot be very pleasant for any of<br>us, as the impact to the country surrounding us will be<br>so substantial. However, we believe that the more we can<br>promote a flow of information, the more appropriate solution<br>will be found. We hope that yesterday's meeting represents<br>the beginning of a fruitful relationship in that regard. | Vic Standa<br>Dave Ruppert<br>Richard Hollamon<br>Lou Driessen<br>Ty Throop<br>Adele Furby<br>Lee Tavenner<br>Timothy Roele | Philipsburg Ranger District<br>Deerlodge Supervisor's Office<br>Deerlodge Supervisor's Office<br>Bonneville Power Administration<br>Star Route, Philipsburg<br>Star Route, Hall<br>Star Route, Hall<br>Star Route, Philipsburg       | District Ranger<br>Soil Scientist<br>Engineer<br>Location Engineer<br>Landowner<br>Chairperson, Granite County<br>Alliance<br>Granite County Alliance<br>Granite County Alliance |
| Thanks again. Please feel free to contact me at any time   | Mike Cooney   | Federal Building, Butte  | Representative for Senator<br>Max Baucus   |
| regarding this problem.  | Charles Miller<br>Jack Fisher   | Deerlodge Supervisor's Office<br>Lolo Supervisor's Office  | Project Coordinator<br>Energy Coordinator  |
|  |   | meeting was to exchange informatio<br>th Route in the Maxville area.   | n pertaining to possible alter-  |
| Judo - Unit - Have Multer Rabel Duly<br>Adele Furby, chaisman<br>Control Warder Weight Granite County Alliance   | determining the end<br>Deerlodge Forest I<br>The draft EIS would<br>tives and comments<br>draft EIS.                        | hat the Interagency I.D. Team was u<br>vironmental impacts than was the De<br>.D. Team was only one step in the p<br>d be available to the public within<br>in the Maxville area would be cons<br>Alliance and those in Boulder Cree | erlodge Forest I.D. Team. The<br>rocess of evaluating impacts.<br>a short time. All alterna-<br>idered as comments to the  |
| County Alliance  |   | ith the Forest Service and Bonnevil  |  |
|  | During the meeting  | , a number of items were discussed:  |  |
|  | appear as hav<br>lands, Becau   | lly acknowledged by all, that the "<br>ing the least total environmental i<br>se of the system used, the longer t<br>impacts caused by constructing the<br>requires more access roads, which<br>stc.                                 | mpacts on National Forest<br>he line the greater the<br>proposed line. That is.  |
| Grans Sat & -  |   |  |  |

11

| prest Supervisor  | Page -2  | Forest Supervisor   | Page -3-   |
|---|--|---|--|
|   | ing for a compromise most beneficial<br>s, Ľaxville residents, Boulder Creek<br>ice. They were seeking a "reasonable | j. West of U.S. Highway 10A, the pr<br>"C" alternative is preferred ove<br>ever, the privato landowners fee<br>forred over the "C" alternative,     | r the "A" alternative. How-<br>1 the "E" alternative is pre-<br>because it avoids more   |
| late for comments to affect the env   | review in March 1982, making it too<br>ironmentally preferred route in the<br>the Maxville area will be accepted as  | private land with springs, corra<br>activity.<br>k. Maxville is the fourth largest of<br>tion in Granite County. Drummor                            | oncentration of human popula-  |
| The importance of the public commen<br>BPA and Forest Service representati  | ting on the draft EIS was stressed by  | second, and Hall is third.<br>1. The "D" alternative crosses an a   |  |
| There were a number of comments per   |  | T. 8 N., R. 13 W., in Boulder Cr<br>by those living in Boulder Creel<br>north, but still in sections 15   | eek that cannot be accepted<br>A line further to the   |
| <ul> <li>a. Miss the private land in the MR. 13 W. in Boulder Creek. Ad<br/>Adele Furby, the landowner with<br/>section 23 could accept the 14</li> </ul> | coording to Ty Throop and<br>h private land in $S_{2}$ of<br>ne crossing his property,                               | m. Project some variation of line '<br>ing west in the S <sup>1</sup> 5 of section 22   | D" further to the south, turn-<br>, T. & N., R. 3 W. (see "a" abovc.)  |
| providing it avoided his cabin<br>b. Miss the private meadow land a   |  | n. It appears that some compromise<br>"E" may be the best location for  |  |
| W <sup>1</sup> 2 of section 15, T. 8 N., R.<br>be acceptable, providing the p   | 13 W. (Such a crossing may   | <ol> <li>It was noted that the Deerlodge Fores<br/>environmental process. This would in<br/>alternatives by the Forest I.D. Team.</li> </ol>        | clude consideration of any additional  |
| c. Find a visually acceptable crown the best crossing may be somework. 14 W.  |  | ferred location would continue to be  | lete their assessment of any information<br>may be that the environmentally pre-<br>the Maxville crossing. It would then<br>be draft EIS and final EIS to affect the |
| <ul> <li>Avoid crossing Henderson Mount<br/>Mountain is visible from long<br/>and the Flint Valley.</li> </ul>  | ain if possible. Henderson<br>distances, such as Philipsburg   | agencies' decision as to location. A <u>Action</u> :  | it this time, the door remains ajar.   |
| e. Avoid going around the south opossible.  | nd of Henderson Mountain if  | <ol> <li>Lou Driessen will provide tentative a<br/>Service, taking into consideration the<br/>meeting.</li> </ol>                                   | lternative locations to the Forest<br>nose high impact areas identified at the   |
| f. Miss the patented mining land<br>(sections 2 and 3, T. 8 N., R.  |  | <ol> <li>Charles Miller will contact Adele Fun<br/>high impact areas identified have been</li> </ol>  | by and Ty Throop for confirmation that<br>on considered.   |
| g. Miss the springs on Ledbetter<br>T. 8 N., R 14 W.  | s land in section 1,   | <ol> <li>The Forest I.D. Team will appraise al<br/>effect upon National Forest land.</li> </ol>   | l alternatives, new and old, for their   |
| <ul> <li>h. Miss the corrals in NE4 of set<br/>if possible. The corrals are<br/>cattle.</li> </ul>  | tion 3, T. 8 N., R. 14 W.<br>used for gathering and working  | <ol> <li>The findings of the Forest I.D. Team<br/>to all concerned, including the Inter</li> </ol>  |  |
| <ol> <li>Miss as much private land alo<br/>the Flint Valley if possible<br/>land and recreation cabins.</li> </ol>  | ng in the southwest corner of<br>secause of the prime agricultural   | It was the general feeling of those concer<br>Information had been exchanged, which help<br>identified by BPA, the Deerlodge Forest, a<br>Maxville. | ed to clarify those problems previously  |
| The location of the "E" alter<br>the "C" alternative in this a  |  | Christian Il.   |  |
|   |  | CHARLES W. MILLER<br><u>Project Coordinator</u><br>Igan Leader  |  |
|   |  | See attached list CMILLER: 1mh 3/1  | 1/82   |
|   |  |   |  |

# March 15, 1982

winik"

Charlie Miller Project Coordinator U(F): PO Box 400, Federal Building Butte, Mont. 59703

### Dear Charlie:

We appreciated the opportunity to meet with you last Wednesday and we feel the meeting was very productive. Thank you for sending a written summary of the meeting. Your summary covers the principal concerns expressed at the meeting. However, we would like to clarify the following points:

A. 1. Alternative: in the Maxville area were proposed prior to the publication of the draft EIS, and numerous comments, including the Feb 4 public meeting in Drummond, were addressed to the BFA, the forest service, and the congressional delegation prior to publication of the draft EIS. These comments were in response to carlier BPA and Forest crvice maps and information.

2. At the meeting it was explained that the Interagency ID Team has not studied or considered alternatives in the Maxville area, and that the draft EIS route through Maxville is not based on any comparison of alternatives in the Maxville area.

B. 1. Granite County Alliance representatives did not acknowledge that the "A" alternative has the least total environmental impact on the National Forest lands. Some confusion exists regarding environmental impacts. Our understanding is that BPA includes impacts to private land and impacts to residences as part of the total environmental impacts. If this is what is meant by environmental impacts, then alternatives "A" and "C" have very high negative environmental impacts.

2. If impacts to private land and impacts to residences are not included, then the information is not a complete environmental analysis, and should include disclaimers to that effect. The limited scope of the analysis should be made clear so that its findings can be put in perspective. 3. The Granite County Alliance recognizes that alternative "A" involves the least amount of Forest Service land of the identified routes in the Maxville area.

C. If it would help reduce Forest fervice resource objections, corridor E could be relocated on its eastern end from Princeton Gulch to the area near the W<sup>1</sup>/<sub>2</sub>Secl3, T8N, R13W.

D. The visual impact of a line north through Henderson Canyon would be worse for the lower valley than the visual impact of a line over or around the south end of Henderson Mountain would be to the upper valley (due to closer proximity).

We hope these points of clarification will be helpful. Thank  $\mathbf{y} \text{ou.}$ 

Granite County Alliance

CC: Pat Duffy Evan Barrett Mike Cooney April 8, 1982

Charcly Miller Project Coordinator USFS PO Box 400, Federal Building Butte, Mt. 59703

Dear Charley,

On behalf of the Granite County Alliance, I would like to thank you for meeting with us on Tuesday, April 6th, in order to discuss routing for the powerline south of Maxville. We feel that we had a healthy and productive exchange of ideas and information that should help to produce improved study of the area.

Last night, Wednesday, April 7th, the Granite County Alliance met and discussed the ideas and the routes which we had dealt with Tuesday in our meeting with you. It was the unanimous opinion of the members present that at this time we would not like, as a group, to go on record as being in favor of any particular one of the lines that we had sketched in with tape on Tuesday. Rather, we would like to re-emphasize that we believe that the best route would lie within corridor E. The members also agreed that the area in the vicinity of the line labeled "K" which lies east of corridor E would also be an acceptable are. to utilize in developing a route.

The membership would further like to express its appreciation for your continuing efforts in actively studying this area.

Thank you very much. Please don't hesitate to call or write if you have any questions, suggestions or ideas to discuss.

Very Truly Yours,

adele July

Adele Furby, chaimin Granite County Alliance

4/9/E

cc; George Eckridge Jack Fischer Howard Challinor Pat Duffy Evan Barrett Mike Cooney

30,05 122

|     |  | Po  | Porest Supervisor Page -2-   |
|-----|--|-----|--|
|     | SO   |     |  |
| 272 | O Special Uses April 27, 1982  | 7.  | 7. Locate the line on the steeper terrain -<br>The feeling was that a line located on steeper terrain would have less  |
| Gar | rison-Spokane 500 KV Transmission Line   |     | conflict with any future land uses. Steep terrain cannot be farmed, is<br>not usually selected for homesites, and is not easily logged. Hence,<br>a good use for transmission line location.   |
| For | est Supervisor   | 8.  | 3. Close access roads to people -  |
| the | the public hearings in Drummond on April 20, and Philipsburg on April 22, public commented on the draft EIS for the Garrison-Spokane 500 KV trans-<br>sion line. Some of the public's comments are as follows:   |     | The feeling was that access roads built to construct the line should be<br>closed to public use. This pertained to private as well as Federal<br>lands.  |
|     | Locate the transmission line on Federal and state lands -  | 9.  | ). Aesthetics -  |
| 1.  | The public continues to state their feeling that a Federal project should<br>be located on Federal land. This is usually associated with the fact that<br>Bonneville Power Administration will not be paying taxes or in-lieu-of-  |     | Assthetics is associated with the visual impacts of the towers and trans-<br>mission line.<br>There was also a concern with an apparent conflict between aesthetics  |
| 2.  | taxes.   |     | on Federal lands, and the impact on people's lifestyles. To some, any<br>transmission line in Montana has an impact upon the aesthetic (scenic)<br>quality of the state. Others feel that a transmission line in their<br>vicinity will infringe upon their lifestyle. |
|     | This public feeling is based partly on the unknowns associated with<br>any possible long range health effects. The folks in Montana do not<br>want such a large line anywhere near them.   | 10. | ). The decision is judgmental and not quantifiable -   |
| 3.  | Do not locate the line on valuable irrigated land or farmland -  |     | According to the people, information contained in the draft EIS is based<br>more on personal judgment than objective fact. This makes it difficult<br>for "outsiders" to understand how a decision is reached, why one seg-  |
|     | The people are stating that the irrigated lands and farmlands support<br>their livelihood. Anything that would subtract from their means of  |     | ment is selected over another, and what the trade-offs are.  |
|     | making a living is not acceptable.   |     | . The process is not as responsive as it could be -  |
| 4.  | Listen to the Maxville people -<br>This concern was given at the Drummond meeting. Because the folks in<br>Flint Valley were causing consideration of alternatives out of the valley,  |     | It was acknowledged that the NEPA process does provide for some input<br>from the public. Nowever, the feeling was that the process does not<br>provide for public impact outside the few prearranged times when public<br>input is actively sought.                   |
|     | they felt consideration needed to be given to avoiding Maxville.   | 12. | 2. Use Corridor "E", as proposed by the Granite County Alliance -  |
| 5.  | Use the Southern Route (Taft Plan) -   |     | The Granite County Alliance states that a centerline within Corridor $\tilde{E}$   |
|     | The folks at the Drummond meeting were in favor of the Southern Route.<br>This was voiced by the ranchers in the Flint Valley whose land would be<br>crossed by following the existing 230 KV line. It was also voiced by<br>the people in Gold Creek, who do not want to see the line go back across<br>the Clark Fork in the vicinity of Gold Creek. |     | would cause less impacts than the proposed Southern Route through<br>Maxville. The impact maps provided in the draft EIS were used to com-<br>pare the two routes. The comparison was as follows, and is in terms of<br>the "E" Corridor:                              |
|     | The Southern Route was considered as being the least objectionable.  |     | <ul> <li>a. Wildlife impacts are reduced.</li> <li>b. Forestry impacts are reduced.</li> <li>c. Recreation impacts are reduced.</li> </ul>   |
| 6.  | Go south of Maxville -   |     | <ul> <li>d, Land use constraints are reduced</li> <li>(measured as cost of obtaining easements).</li> </ul>  |
|     | This was voiced by some at the Drummond meeting, and many more at the<br>Philipsburg meeting. This item can be related to staying away from homes<br>and avoiding people.  |     |  |
|     |  |     |  |
|     |  |     |  |

Forest Supervisor

Page -3-

- e. Erosion susceptability is cut in half.
- f. Soil mass movement is reduced.
- g. Cultural resources impacted would be fewer.
- h. Concentrations of people (Maxville) would be avoided.

There were other concerns presented by the people that pertained to taxes, health effects, effects on people and cattle, weeds on disturbed ground, and people. These expressed concerns can more effectively be answered by Bonneville Power Administration.

The above 12 items listed pertain more directly to National Forest lands, and could be included in the factors considered by the Forest I.D. Team.

Jarleli mille

CHARLES W. MILLER Project Coordinator

cc: Jack Fisher, Lolo NF George Eskridge, BFA, Missoula I. D. Team Members (Garrison-Spokane) Lou Driessen

CMILLER/jmh 4/27/82

L-LL-1-628 May 27, 1981 Dear mr. Ectorge, This is in regards to the proposed BPA line chrough the me sille area + the estire BPA. line . I wish to express my concer I apprehering over the unnecessary lisuption of people and property. no owner in tranite County near the area of the paped line. I strangly its constantion due to her (people + ani al) factors, its eye sore, and necessary proceedings in the upkerse of the line once the Instead of disrupting so many lives + causing so much dissension why not use an alterate route such هه mov south a route near or in conidor E as the Faces dervice has suggested + encouraged. B. P.A. La done a busey got with thur EIS. The pople of this country are suppose to have a say in its use and if BPA. would stop and look at all of the protest the would understand the powerline is

L-LL-1-628 May 27, 1982 L-0I-1-6 2여 ITTr. Beorge Eskridge not even want by a big porcertage BPA Traismission Coordination Office Box 4327 of an population Missoula, Montana 59806 It is unfair to force property awners & shoulder the burdens, fenancial Dear Mr. Eskridge : enviormental, etc. of something that is unnecessary and not wanted by iso Re: Draft EIS & Appendix many. We have the right not to he Garrison - Spokane 500KV forced into anything sa ridiculously Transmission Project unnessary as this BP.A. cannot say I have reviewed the referenced this line has anything to do with EIS and would like to offer the Live, Liberty, + the praint of Happines, following comments : It gave against all-thus . has caused dissension between friends + neighbors. (1) Pages 3 \$ 4 ( Section 2 of Major Conclusions) of the EIS Sincerely, Summery discuss the No Action panet Koon alternative for the proposed 12750 Lewis+ Clark De transmission line. In doing so Jolo, matara it contains words and phrases such as "reinforcement", "would 59847 Brobably require shutdown of one of the 350 MW generating anits", "power overloads would be more likely to occur", "indirect impacts", "Isolated difficulties of maintaining voltage levels might occur", etc.

2\_

I realize these phrases are taken out of context - but they are not words which would be ordinarily used to predict inevitable gower outages with disastrous results. the. discussion goes on to say that If this project were not done the power transmission loses would be about \$ 2 million for BPR & WWP and several times that for Montana Power. A total loss of some where pround # 6 million - but a cost To connect of about \$ 190 million. My conclusion is that this Broject really falls under the "nice to do" category and is not essential at this time and may not become so in the future depending on alternate energy sources and locations of their development. the remeining paragraphs of Section 2 list many good reasons for not doing the groject. (2) Assuming that this project

is and must be done, I feel that the Draft EIS pails To

justify the recommendation of the Teft plan as being environmentally Richard. For example - Taft uses only 33.5 miles of existing ROW and requires 224.2 miles of new non-parallel ROW while the Hot Springs glan requires 119.3 on 109.4 miles depending on the routing. Figures 4.11 and 4.13 are clever antists conceptions as To how the line might be hidden - but Figure 4.12 shows more closely what a transmission line really looks like. It just does not make any sense to devestate more miles of ROW when existing ROW is stready available. 13/50 - in reading the analysis of the alternatives and the areas of concern I got the impression that the existing impacts caused by the existing transmission lines were being Ignored \_ almost as it impacts which would be caused by the

Proposed Garrism - Spokene system

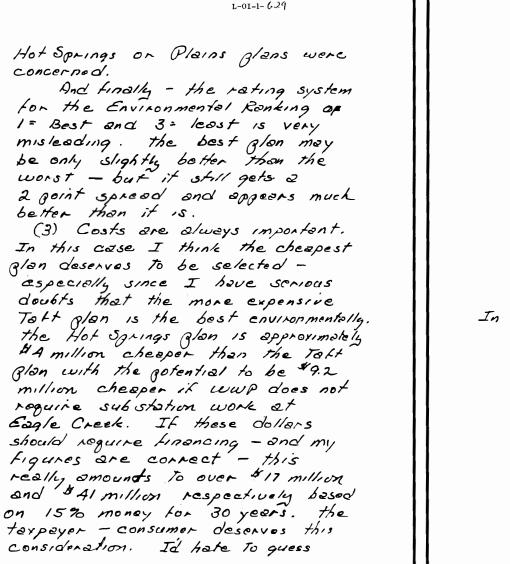
were being measured know point

zero, I don't feel this was

a fair comparison where the

3

L-01-1-629



4

L-01-1-6.29

at the costs if the whole \$190 million required financing. (A) My specific interest in this

Project centers pround the proposed Clark Fork river chassing near St Regis under the Taff glan. To be perfectly honest no crossing is that vicinity with or without towers in the flood plain - with or without acrial warning devices - with on without color toized towers - is acceptable to me.

- In summary, my recommendations are: a) Don't do the project.
  - 6) It you must do it then use existing ROW wherever possible and at the cheapest cost - ie. the Hot Springs plan,

Sincerely,

Games Dzeuze 1560 Blue Lakes Twin Falls Ideho 8330/ Danse of Celly

L-CD-1-63(

May 27, 1982

Bonneville Power Administration Transmission Coordination Office 1620 Regent, P.O. Box 4327 Missoula, MT 59806

RE: Garrison-Spokane Transmission Project

Dear Sir/Madam:

I'm very disturbed by the BPA's plans to build a 500,000 volt electrical transmission line from Montana to Spokane. The need for this project has not been demonstrated, and eince it could prove disastrous aasthetically and environmentally, it should be cancelled.

Parts of the powerline pathway (especially the Lookout Pass area and Chilco Lake) have exceptional scenic value. All of it is beautiful forested country which should not be defaced by this unnecessary project. Sacrificing scenic beauty for a grandiose and not required powerline would be disgraceful.

I object to the clearcutting of forssted lands and the roads they would necessitate, and I think it would be unconscionable to deface the pristine beauty of Lake Chilco with a poweline- an UNNECESSARY powerline. The possibility of aerial herbicide spraying, which right-of-way maintenance could require, is very disturbing.

Because the proposed powerline has not been demonstrated to be needed, and because the construction of it would cause aesthetic and environmental damage to this beautiful and pollution-free part of the Northwest, it should be immediatelly scrapped.

Sincerely,

maniton Manguer - Stray

Marilyn Mangion-Gray

818 Mullan Avenue Coeur d' Alene, ID 83814 1.-11-631

BPA Transmission Coordination Office 1620 Regent P.O. Box 4327 Missoula, MT 59806

Dear BPA:

The Draft EIS proposed power like routes service the Pacific Porthuest to with Colstrip power is an insult to Montanans and all Americans. The entire project is unnecessary and unuanted. unfair O. BPA stould be investigating alternative energy surces to produce power clocally rather than assisting with the continu rape of Mortana and the madness that has gripped ous society to burn the remainder of the fossil field Dan ironic dinosaus of Sureaueracy that parallels... the dinosature whose posels we now burn to poclute main.

and wind energy, and cause

express extreme concern over the current right-of-way location of the Bouneville Power administration Proposed Garrison - Spokene Sco-KV Transmission Project. We realize severel alternative routes are being studied; we base our concern on information received from BPA staff of the open The Rumrock Property Owner's Association wishes to according to this information current right-of-way siting for the project is through the North end of the land area locally known. as the Rimrocle, in basically an East-luest direction. house and meeting in Courd alove, Mako. May 24, 1982 L-HL-3- 3 % Utth: George E. Eskridge Project Juformation Officer Transmission Coordination Office Bonneville Pavar administration Dear Mr. Eskridge: Missoula, Mt. 59806 P.O. Box 4327 Nortes you some to BPAS What hoppened to BPAS mission of Providing low cost mission of Providing low cost posit fueld will (could) ever of fossit fueld will (could) everly us to action errory set sufficients Deven be there of sout-situes bound suggest / that could power be thermitted on 500 KV some them stored in 500 bound will the government office them there. This plan is Surveyed appear. Neval & Caplear. 1905 Likeate Dr Lolo, MT 57847 He public 1:3-1-11-1 public power? Nu wasteful power what and furneeded po are not what p ,

Page 2

L-HL-3-38

More specifically, the line is proposed to run along the Northern border of Sec. 16, T. 52 N., R. 3. W., Kootenai County, Idaho. Continuing into adjacent Section 17 at a southwesterly angle from the Northwest Corner of Section 16, the line would run across Rimrock Road, over Chilco Lake, and angle off the Rimrock ou down outs the Rathdrum Prairie.

The B.P.A.'s draft Environmental Impact Statement classifies soils in this specific area as having low erosion susceptibility as well as low potential for mass movement. However, in Soil Survey of Kostenai <u>County area</u>, <u>Ilaho</u>, a 1981 Soil Conservation Service Publication, these specific areas are classified, as steep slopes, moderate water permeability, very rapid-run-off, and very high erosion hazard potential.

Personal experience of landowners in the North Rimrock. agrees with the S.C.S. geological evaluation. Recent development projects have compounded an already acute run-off crossion situation wherein the local road system must essentially be rebuilt annually, turbidity in

# Page 3

L-HL-3- 3 8

area streams and ponds has increased markedly, and siltation and sedimentation has caused increasingly diminished reservoir capacity.

The Rimrock Property Owners' Association strongly feels that the proposed powerline construction project would over burden the existing soils problems in this area. It is for this reason that we urge your further study and selection of another right-of-way localion in an area of less potential environmental degradation.

> David L. Haman, Chairman. Powerline Committee Runrock Property Owners'Assu.

D.L. H/S.C. 5/24/82

P.O. Box 931 Hayden Lake, ID 83835

Mile more of this L-OW-1-6-3.2. L-1-1-632 Dean George Cobridge, Comments regarding the Jarrisen - Spokane, Iransmussion Inopert ( 4/12/62 En Delles High the real) When constanting the new B. P.A line in our area, please Reposed Ravielia consider alignment of the ting Bureline 50 stal toround with the shit. ing ones across our meadour IREAL Rd and up the rounded hills so the tawers den't append to be insuling the whole ana, Thank you for PS. As you can see, we dre your cooperation surrounded I steace with Fred A. Rogers Residence Rite 2 - Campbellie Box 842 Rt. 2 Otis Orchards the growth of the serie try these Box 842 Rt. 2 Otis Orchards, WA 99027 Ofter One hande, Mm ne caseile

'224 ' 132 Mps Heek Hunner of meduille or here and all. tok the corridor & rout south Aprilian the tight south and The core theirs that definitedy stand the concert and harmed Un accurate E 15 Statement and to Serve this more and pupor 12 think BPA shared he required of maps and mustation in fre-schooler Bright have there Looke like maybe a group of the fifth calle the E 15 statiment. they were been which to comment again down the publics threat, and Bth so why force all these BS EE9-1-XW-1

thad no in care clory it to even transports to pratice, in weath an hour to the but I'V, tell 100 there are hearth led the the there and the future and Aburk a turn, thur we kend two by there plends and the west count. I khun you adverad to sight to secure Guestion, le Let and and all del ibus או באר או שו כא יר גרן נושמוי בר ז ויוו allow the there are the west and to they build read in the the the the Carrier & prit the Lenne Guilden " preferral day to conte al che a horner private frateit awarden I week bour proper of mederice as will do the luck your dennythe du reque the the (רידר נולטייי נוח נחרו נייג/ בנגרון א Aleas Suras Kill Minner HIS ~ \$ 9e/s Ada ( ) Sat LESAS LU BPH EE7-1-XW-1

VI-303

de graze-1 cent il proge 3 Concentrate ou my property as week propleme, and alse that the gene so timberd dest terrere have i war When to know that the more found hand it have formed goot land, Suraud like present apply to are presente loved as well, I want the BPAto Encore, That I have perme will ever serve of ever presents cangeland. and so and . The "aft rente, as purposed busian problems, yame habited thatudence Bunker ware , Terracht of the Care flored of their reasons for red evenue good hand. adapt thom. I would when he convort on and to my burn ledge no one wind the here. pushing this down the pushies there at tend Hay can may de their 31 A wo the agenery property chluco will was be perdeged and health and levelations , as weret a future around all property acores it hat there EE9-I-XW-I

. . . )

The heat with toute on BPA to livestock health and so on and ou. the the people, handewourd, human headly of public come I watered due public the line will be truit " segardless Anoward duratly and that are that are made up which route thing plead am consourt that they mude and turd more and they our there our and talk from back sides of their most Just and leating to the bill officed aller attending the Accorded nig bue do well as carlotury would 3 auch the mellion plants in black, toury deapped, loungy and the west coust, with several Als there is a read for a holiticad and adjoining profesticos dates have to appressing the Tapp Could Then Maprille Allow and dever to go on busid I am so dettop wonder of the describe (o, EE. 7-1-XW-7 28/24/H  $\bigcap$ 

I would encourage BPA to take a four hard look at the truther this line is going to course the residents of madvilles as well as ather land it necessary, and we will be been for the been with these brues forwards 200, Human and make some alterations are only a few of the goods SAA made. т-мх-1-633 A protest the Jack rente definitely, and propose that 2 14 ne the Connect a more at all, taileraded thue with haste. These Hert Blue Hace, Sur . ¥ Hall is primitive area fright free hibitet it and to ampone met a quarted with this even du of gairy beev some of Real strings, while the Ke an unan. Checkinacenteres in the Ers Satement are tappend if the gal worldn't About Sos 9 mos of the year, 50 the way I figure my timber Sheals have the Some Value as forest server, also the home is disturbed from tabitat, 155 there roum we invaled, as they apply the beth. BPH Daya they their 125' right auray, but care there at 125' right auray, the It was never to me after living here for 37 years, that we don't have any productive irrigated land around the ball and . Some of this are acound lither way, Do in our case here then In mile And some places /4 mile, why but more it to good fand entried. Also Durald like to commit E15 map L-MX-1- 633

May 26, 1982

Mr. Estridge:

L-MX-1-СС7

I would like to submit the following comment on the proposed twin -KV 500 powerline proposed from Gold Creek to Spolane. After studying the E15, which dealt ungarly and untruthfully with the Maxinule area, I feel the only possible intelligent alternative is the No Action proposal.

I understand that Montana exporte about 1/4 of electricity generated here each year, therefore in juture we (Montana) would still have adequate power to meet demands. As for outside Montana needs, & ful that BPA and the Pacyic Northwest area has addressed that issue # regarding their needs by abandoning. WWPPS plants # 4 and #5 and mothballing. a third. If they ful they don't need additional power, who are we to ensist they take ours by building privatines that clearly. aren't needed or wanted.

> Beverly J. Stinner Drawer A Hall, Montana 59837

ec. John Melcher Nax Baucus Pat Williams

George Eskridge, Project Info Officer Bonneville Power Administration Transmission Coordination Office Missoula, MT.

Dear Mr. Eskridge,

Please accept the folling comments on the Garrison-Spokane Draft EIS and include them in the record of this proceeding.

L-MS-1- ( 34

Richard Steffel 710 S. 4th W.

Missoula, MT. 59801

(1) The draft statement is deficient in that it does not adequately consider the possibilities of future transmission lines following the proposed corridor. Since one of the major goals of this project is to "allow for parallel line location should additional future transmission be needed," (goal #6, I-1) the likelihood of such an occurrence should be explored. This is especially relevant in that it appears that the project is directed towards selecting a <u>new</u> corridor instead of using existing rights-of-way, and in that the question of future need will probably be left to BPA (as it was in the present, unfortunate situation). If providing for future lines in indeed a major aspect of this proceeding (as is implied, pp.IV-5 and 6, and Table 2.3), the likelihood and impacts of such lines should be explored and explained. In lieu of a complete evaluation and disclosure, the proposed new corridor should be scrapped in favor of the use of existing rights-of-way wherever possible.

(2) The possibility of future conversion of the new lines to direct current transmission is mentioned briefly several times but never adequately discussed. If such conversion is out of the question, it should be so stated. But if future DC transmission is even remotely possible [as is certainly the case since the line from Garrison west will be constructed "with the potential for convertibility," (IV-6)] that potential and the ramifications of conversion to DC should be fully explored and revealed.

(3) The contention (pg. IV-8) that "transmission systems discharge barely detectable amounts of ozone..." should be substantiated. Since ozone is a criteria pollutant under both the Montana and the National Ambient Air Quality Standards and is regulated by both the state and federal programs for the prevention of significant deterioration of air quality, the net emissions increase of this pollutant should be quantified. Supporting literature and modelling techniques should be specified.

(4) It appears that the more or less permanent removal of timber from the right-of-way and from access roads is termed a "short-term economic impact." (pg. IV-13) How can it be considered short-term if it must be cleared for the life of the line? Likewise, is land used for access roads removed from production for "at least a short time" (pg. IV-4), or is it permanently removed?

(5) The discussion of the possible biological effects of 500 kV lines is misleading. The intent of the Draft seems to be to downplay the likelihood of any negative impacts; but judging from the information presented in the document, such negation is not warranted and should not be used to convince the public that we are safe. For example, discussion (pg. IV-22) of the Battelle N.W. swine studies notes that no chromosome damage has been found. But birth defects have been found that may be related to exposure to electric fields. This latter

L-MS-1-34

point is not discussed or even mentioned except in the fine print of Table 4.11. In fact, the information in Tables 4.10 and 4.11 reveals a number of possible biological effects that are not reviewed in the text, which instead is used to downplay the potential of any effects whatsoever. This approach is not honest for at the very least, the potential of biological impacts remains open to question. Instead of dismissing this possibility, the uncertainty should be admitted and then fully and openly discussed as part of the decision-making process. If detrimental impacts remain a possibility, the line should be buried in places where people or other sensitive species may be exposed.

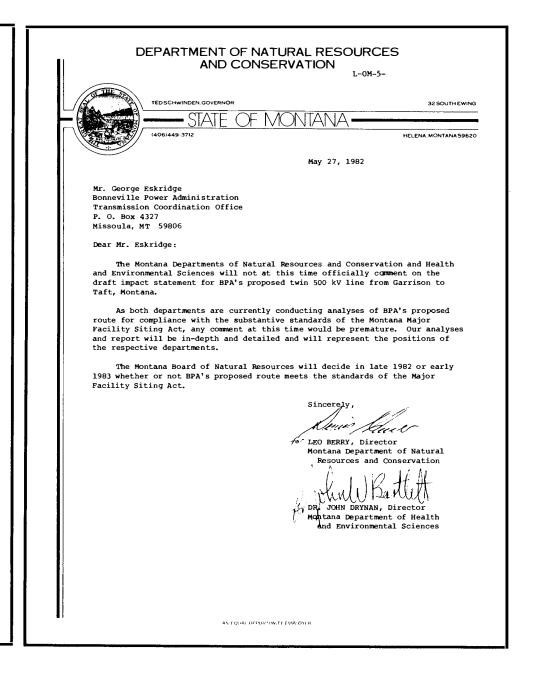
(6) Conifer tip burn is noted as a possible effect of exposure to electric fields but no mechanism is ever delineated. What causes the damage?

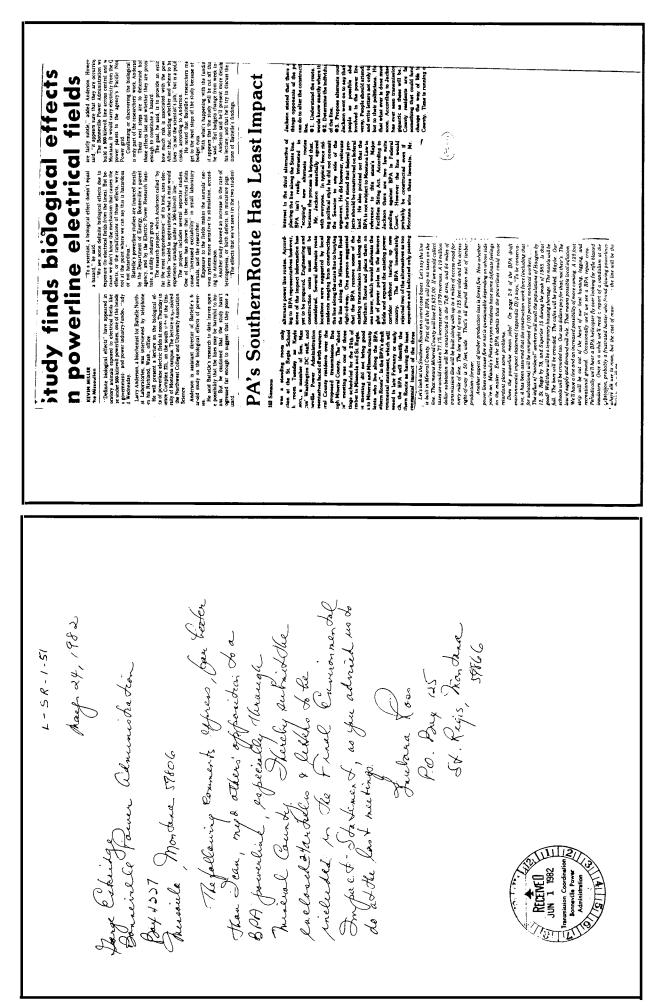
(7) A comparative analysis of the proposed corridor with the route that was originally approved by the state of Montana should be made. Only then can the people of this state really judge the choices before them.

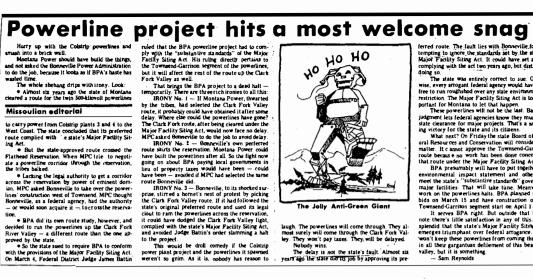
In closing: I am not convinced as to several key aspects of the draft environmental statement. I do not accept the BPA's basic premise that the need for this project is a "given" and therefore beyond the realm of discussion. This is a particularly inappropriate stance given the unwillingness of the BPA to adequately compensate impacted area with funds in lieu of taxes or other compensatory funds. Since the areas through which the lines pass will be "permanently" affected by them while only the producers and eventual users of the power will ever benefit, BPA as the medium of destruction should make due restitution and compensation. Certainly the carrot of short-term economic benefit pales to nothing in the face of the long-term social and environmental impacts of this project. Consequently, I suggest that the project from Garrison west should be abandoned in favor of load center generation of whatever electricity is needed <u>after the implementation of a comprehensive program of energy</u> conservation in the areas of supposed need.

I appreciate the opportunity to comment, but I wish the comment period was longer to provide more time for review of the document.

Sincerely. Richard Steffel







ferred route. The fault lies with Bonoville for at-tempting to ignore the standards set by the state's Major Facility Sting Act. It to cold have est about complying with the act two years ago, but distained doing so. The state was entirely correct to sue. Other-wise, every arcognal (decral agency would have (eft free to run roughshed over any state environmential restriction. The Major Facility Sting Act is too im-portant for Montana to let that happen. There powerlaws will not be the last. Battin's

portant for Montans to let that happen. These powerines with onlo be the last Battin's judgment lets federal agencies throw they must get state clearance for major projects. That's as a mash-ing victory for the state and its citizens. What next? On Friday the state Board of Nat-ural Resources and Conservation will consider 'the matter. It canot approve the Townsend Garrison roule because no work has been done concerning that route under the Major Pacitity Sting Act. BPA presumably will have to put together an environmental impact statement and otherwise meet the state's "substantive standard" governing moter the state's "substantive standard" governing work on the powerlines halts. BPA pleaned to let Towneed Carrison segment stat on April 1. It serves BPA right But outside that bitter note there's little states Amore Facility Sting Act emerges thumphant over federal arrogance. That won't keep these powerlines from coming through in all their gargantam defilement of this beautiful valley, but it is something. - Sam Reymolds

1-5R-Ś

(1-1+1)

## of the Missevilan

ef the Missestion Near the end of Monday night's hearing on the Bonnevilk Power Ad-ministration's propaded Stabilized powersite. Roy Androge with the to "T Duhk that people in this area," aid Anderson, who orwas hous east Miller Creek, "are universally opposed to this powersite." Anderson was one of more than 30 powersite." Anderson was one of more than 30 hearing on the foropied powerlines None of those 30 defended the Uses. About 150 people attended the hearing at Big Sky Kigh School. The BPA has already announced its "environmentally preferred" route mat electricity from Colsting penent-ing plans to the Pacific Northwest. That route, known as the Tai plan, would pass through the Miller Creek area south of Masolia after It leaves the Garson substation west of Deer The route would cross the Ritter-

the Carrison substation west on seen Lodge The route would cross the Bitter-root River and Righmay 93 about four miles south of the Buckhones Bridge, turn behind Bitter Mogalital, ben cross the Clark Forth River west of River River Route Route River Region The BPA has not officially decided whether it will use the Tail route. But many of the people who testi-

0

 Powerline plan coundly rapped

 Inder Monday questioned not only whether built on the Tail rough, but estimates the built of the Tail rough, but the tail the ta

A before one of the base of

# L-SR-1-51

# TUTTUUVVIIGIS UUSS.

lan't it time we property owners band together, and attempt to obtain a more equitable method of compensa tion for high voltage powerlines crossing our lands?

The present system of procuring

# Local comment

these right-of-way easements has evidently been in effect since the first ission line construction began trains over 70 years ago. And I might add that it is all right. All right for the powerline owners and all wrong for the property owners.

Just because it has always been done that way doesn't mean that it is right or fair. It will take a suited effort on the part of the Landowners and nme legislative help from our invabers to a chieve any change. We cer-by can't expect the powerline own-initiate such standard ment.

I suggested a tease one contract to the Washington Water Power when they crossed out ranch property in the mid-1960s with a 230-fr line. They retered to consider any contract other than their own prepared standard own prepared standard form. in I objected, they remanded me of their right of "embent do" main," which of course in essence says, "Take what we offer you because you have no other choice.

I believe every fellow larmer and rancher who has high-yoltage power-lines crossing his or her property will agree that these structures cost you money. Not just one time but every time you farm around them -- wood pole structures less than steel towers, but they still cost you money.

Beides being unsightly and irritaas, these structures and coodectors without question devalue your property. Land on these rights of way, at least on BPA rights of way, is lost forever for build up ates. The best home site on car property happens to lie directly / enests a 230-tv line.

These lir es cast you in loss of tilleble use ...der the towers (approximately 1,000 square feet for each \$30by tower and considerably more for the 500 ky lowers). They cost you in extra time to work around these obstacles, in waited fuel and seed, in rough ground from having to plow from four directions, plus whatever the cost of

the property owner.

mental anguish might be.

Just consider the time and trouble involved when you have to break your pattern, when plowing, discing, seeding and harvesting around these strucally do become weed such beds in the middle of your fields. Who hasn't damaged expensive farm equipment from accidental contact while working around these obstackes?

Why should the owners of highvoltage powerlines get a forever-use right for a sominal one time fee? They tell you the land is still yours, but they also place certain restrictions on what you can and can't do with your own land on their rights of way. Their ensements also guarantees

them access. I have had BPA crews drive through my hay fields a week before cutting time for no other reason than a routine patrol. If you should purchase property with power-lines already crossing it, you will put up with these impediments as long as you own the property and you will never receive on penny of reimburse ment for your expense and trouble.

All the powerline, owners ever had to pay or ever will have to pay, unless the system is changed, is the original

# tures on tillable ground should be connon-tillable land.

pittance paid to the landowner at the time the easement was secured. For the seven towers located on our land. we received the grand to 1 of \$150. Five of these towers were on the property when we purchased it.

It is my contention, and I know the thought isn't new, that these rights of way should be in the form of a landuse agreement in which the owner reprives a yearly rental fee for each tower located on his property. The amount should be reasonable, with a differential paid for the type of ground Apolved. The amount paid for struc- Jenn. These power corridors have to go

somewhere, but when they insist on siderably greater than that paid on crossing your private land, they should we be willing to reimburse the owner the A cost of living clause should also reasonable amount on a yearly basis as long as they are using the land. If the he written into the contracts (the govemment includes them in most everythey should remove their powerline thing else). These contracts would they would owe you nothing after think a. have to be permanent and transferable time

with the property ownership. They couldn't be cancelled at the whim of If the powerline owners were will " ing to do this, I feel they would enough counter far less bitterness and propile erty-owner resistance when attemption don't have any bone to pick with priing to find routes and obtain right of way agreements. - Lyle, J. "Tuffy""" Smith, Box 742, Thompson Falls. (nat To an and the second second

# t. Regis packs **PA's hearing** STEVE JONES here ad bloods to be used

Tespondent T. RECIS — Angry residents of St. Regis through Mayo Gulchin clear et al County Thursday mght ac view of St. Regis residents. An alterthe Bonneville Power Ad nin- nate route would pass about 4% mile tion of ramming win 500-kilovolt further north through Tamaraci erlines through their county be Creek. ertines through their county be terky lacked the "political court her neighbors - The line is not environmentally that in eighbors - The line is not environmentally ed, it's only politically preferred." under consideration (Their is Alternate ed streage reading list Steam) - In othe accompanying may ing Thorsay's BPA heating is 5t Jacom's angry criticans hough and the account of their is alternate base from more than Øarez real-account of the time and proserver.

suce from more than 00 arear cmi- page statement signeds y 51 Stamarck is crowed into the small buff. Creek residentian of poptry owners. Most, firing questions and charges at overlooked. County Commissio on caterna. In more than two hours of test. Creek residentian of poptry owners. Most, firing questions and charges at overlooked. County Commissio Down and the the Most of test of the state of the state

# St. Regis

(Continued) spoke throughout the evening. Restdent Denley Loge argued that the county's main assets are logging, wildcounty's main assets are logging, wild-life and its visual beauty. The powerine will have dramatic impacts on each of those areas, he said, yet Bonneville still classifies the route "environmentally preferred" "That's totally inconsistent with ety values and the effect of high-volt-age lines on people and livertock: Cost was also a major considera-tion and Tamarack Creek resident Barbara Ross circulated a petition throughout the alternoon and evening asking BPA to choose the least expen-sive route to help keep electric rates down. Beard and your series and your series and the series debed you wave the fact sin this area, "Logesaid 'It's politics, that's all " Politicsaside, Bonnevilleengineers doggedly stuck to the facts presented in the duaft EISin the dualt EIS A workshop prior to Thursday evening's hearing drew about 30 local residents — some of them angry, but most were quietly insistent that BPA

down. Ross said she had 300 signa-tures on the petition. Thursday night Loewen, who signed the petition, agreed. The \$185-million Hot Springs choose another path outside Mineral County "Why can't you put it where you've route is \$4 million less than the cost of already got a nght of way," said St. Regs readent Dennus Loeven. He whar retering to the Hot Springs route

-<u>2</u>. an Mainte

SPA officials said Thursday night that alternate one, show here, is no longer being considered for the twin SDO-i powerlines.

through Sanders County to the north. "You already have a line there so why don't you put this one beside it." and However, rancher Torn Anderson However, rancher Tom Anderson and his wife, Heiere, had money concerns of their own "We're still considering the Hot Springs and Plains routes," said BPA engineer Frank Ward. They haven t "We had it appraised and we just put it up for sale." Helene told George Eskridge, Bonneville's Missoula infor engineer Frank Ward. 'They naven u been ruled out - nothing has been demation officer . Then you guys come cided at all." But Ward's assurances didn't

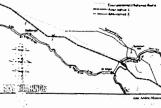
of course it'sgoing to devalue ou lessen the opposition Residents' main concerns were the visibility of the line property." Tom Anderson said after discussing theroute with Eskridge "It discussing theroute with Eskroge" it looks like they're going to put a tower right on our land." That night. Anderson took thefloor at the learing and asked Bonneville to consider another route through south-em Mineral County But the route enthrough St. Regis, its impact on prop-erty values and the effect of high-volt-

ern mineral County But the route en-dorsed by most residents is one en-tirely outside the county. "I can't be-lieve BPA is going to put that line in our backyard." and Charlie Antos, "when they've already got an estab-lished route at Hot Springs' A BPA official and after the meet-met that the turnout in St. Bene etc.

ing that the turnout in St Regis exceeded that of the Spokane, Coeur d'Alene and Wallace, Idaho, licarings

10:-(-)

down. Ross said she had 300 signa-



VI-310

# **CORRESPONDENT'S** COMMENT

## **Bill Sansom**

Mineral County Residents are in the unique position of living in a county that is over 85% publicly owned. That means the Federal Government can force feed us any thing they want and make us eat it. They ran an interstate right through the middle of what little privately preparing to run over us with a 500,000 volt power line.

The Bonneville Power Administra-Mineral County residents felt at the recent public meeting in St. Regis, they were only interested in telling us what they were going to do. --Like it or

They aren't interested in Mineral County's economic or environmental future and they don't care about the landowners who are getting used to near the effect of a personal letter. being told to move over. The only Impact the BPA is tuned into is the political impact. Quite aimply the other two routes interfere with the Indian Reservation or the Rattlesnake Wilderness. The shortest route is through Mineral County. (See lines and bigger lines if you let the first corresponding map page 5). Practic-line in you've opened the door forever.

ally all of the Minstal County Route is over public land. And the final kicker is that here hist isn't enough people here to make much political

Its not going to happen all at once, but Mineral County is going to become an energy corridor. Everytime some bureau at decides to run over owned land we have and now they are us he'll take another nibble out of our private land. Every nibble means higher taxes on less land. There's only three things we can do about it: tion wasn't interested in HOW 1. Become an Indian Reservation, 2. Become a Wildemess area, 3, Write our Politicians and tell them if the BPA lays one foot of line in Mineral County we'll vote against them in the next election. Start with your county commissioners and don't stop until you sign you letter to the President. Petitions and protest will not have Don't let a few 20¢ stamps (which is another thing government did without asking) stop you from stopping this PBA line. Don't fool yourself into believing this power line will be the last one either. There will be more

# .etters to Editor

Open Letter To: onnevilie Power Administration ortland, Oregon entlemen:

3, R-28 in Montana, let us add our forget the location of the transmis lice to the list of opponents to the oposed Garvison-Spokane translasion projected route through St.

# igis,

# understood dat power is

eded, and that apparently, it has en decided to transmit the gener-3d power rather than the fuel. wever, it seems to this writer that

decision making process can, after the decision is made, go back to the As majority owners of Sec. 10, T- day by day mundane chores and sion corridors. ----

Those of you involved in the

Sincerely, Robert E. Anderson Shirley Ann Anderson St. Regia, Montana

L-SR-1-51

## 1 .....

# pponents in St. Regis, Miller Creek urged to be 'squeaky wheel:

# KEVIN MILLER the Missoulian ad staff rep<sup>orts</sup>

Residents of the St. Regis and Miller Creek cas Tuesday told an aide to Sen. Max Baucus, D-pol., what he already knew: They doo't want ? Bonneville Power Administration to build erlines anywhere near their 500-kilovolt p

mes. Kayle Jackson, energy advant to Baucus, told ople at each of three meetings - one in St. sgis and two in Missoula - that although no nator has control over Bonneville. Baucus will >rk to make the agency listen He also said Baucus supports two pending law-its that question Borueville's authority to build

e lines Two Bonneville officials who attended all

me meetings spent most of their time trying to assure people who live near the proposed south-

saue prophe who live near the proposed south-no werkiner oute.
Turn Murray, chief of Bouesettla's entrief. The Montana Power Co is building the est.
Turn Murray, chief of Bouesettla's entrief. The Montana Power Co is building the est.
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area. He said Box major new line in the area

Valley

At all three meeting, people saked Marray whether barbar noss is so integristencient, also ally car meeting barbar noss is so integristencient, also ally car meeting during the bolicays — expectably one area. He said Bonorellies 10-year plan calls for only one with little prior notice. Tim glid they the BPA officials beard all the people and the set of the set

People who advocate centralized power plants, and the big powerlines than spring from them, un-willingly advocate fewer jobs and boom-and-bust

energy growth. Nalikal Resources and Conservation, in September gave a good lesson on energy at the Alternative En-

**Missoulian** editorial

ergy and Renewable Resources conference in Mis-

Energy must be thought of generically, he Energy must be thought of generically, he said. A Btu (British thermal unit) of heat saved is precisely the equivalent of a Btu burned. Invest-iment in insulation or solar energy to save heat is the same as investing in a big coal-fired plant to precise heat Monitora must invest in a same who for the same state heat the same same burgers. create heat. Montana must invest in renewable (or sustainable) energy and in energy conservation. Berry said

jobs, dry up and a bust occurs. But there is an endless backlog of conservation

tors

time T' payoff is long-lasting and, if the building (a h example) is cold, the canital invest-

previously united of -- to the testing alternative high lower, based on Bouwerld's in-house motivity. More than 100 St. Registration endeduced testing of the testing of the state of the s

and then roughly parallels interstate 90 to the basically right through your methods border. It passes barely north of St. Regis - wid He urged St. Regis residents to speak up wid: He wgeu or, negs resours or spean up, exert political pressure on the agency. "It's the squeaky wheel that gets the grease he said. "I'm strongly urging you to sque"

Murray said this option bypasses the Ninemile illey, although Bonieville's maps show a possi-

Valley allocate Bonuevite maysent be anto the anto the anto the other two routes under consideration boudy." Development of the anto the anto the other two routes constrained with suggestions about alternate route there are an anto the suggestions about alternate route the state of the two others are other and the suggestions about alternate route the state of the st

would terminate in the Plains area. Bonneville says it needs the powerlines to carry electricity from the coal-fured generators at Colstrip to the agency's Pacific Northwest power hours Suggestions from the audience included ru ning the line<sup>3</sup> farther south than St. Regis; eith along the Sanders/Museral county border, alo.

settler secteowieder
 Neither St. Regis nor Miller Creek resident
 (Them to POWINELING part 3)
 "Barculy, revynee
 media with wants it out of the minds with object and with mental it out to be proposed routice possible.
 Minor adjustment to the proposed routice possible and the minds with object and the possible and the minds with object and the possible and

But he added that having room formore than one line pie's pretty united opposition," she said

(12.11)



Such an investment would create many more Such an investinent would create many more jobs than building big power plants with huge pow-erlines, he said, and it's asy to see why. A power plant is a big project. Workers move in their tail-ters and a boom results. When construction is over,

and greewable energy projects. Investment in that also tap's talent already living in every comunity - carpenters, glaziers, plumbers, masons, insula-

Investment in conservation is expensive, but the payoff endures A major coal-fired power plant has a life of 35 years or so Then it's worn out. Insulation in a building, or a passive solar system to supplement building heat, lasts the building's life-

(over.)

# VI-31



# L-SK-1-ST Take a look L-SK-1-ST Take a look Take a lo

"Utility companies and government agencies tave been stringing high voltage Powerlines scross the United States for 80 years. Today, 100,000 miles of these lines line the country together like avest alectric web. Most are 350-16 500-kilovoit lines though 785-u lines are beneficit on screent and the

ky lines are beginning to spread, and the technology for much larger ones is being developed. The Bonneville Power Administration plans to

build twin 500-kv lines neer Missoula, probably up Miller Creek or the Rattleanake. They will cercy electricity from Colstrip 3 and 4 west

Nobodywanta tolive nëërthe powerlinës. They will be huge, hung on 175-foot-tell towers. The transmission lines will destroy the scenary of the altevs, hills and fields they cross And Peopla are frightened that the snapping lines will be carrying unknown health hazards for those living nearby. In its public relations effort, the BPA has been In its public relations effort, the BPA has been holding hearings in which agancy officials are polite and reasauring. George Eskridge, BPA's Missoula rapresen-tative, said at a recent hearing. "There is no evidance of detrimantsi affects. We've had high

voltage lines for 30 years and haven't hed any problems " problems." If by evidence he means proof, Eskridge is

right. But than there's no proof that tobacco is nhealthy; the evidence is mighty suggestive however. Battelle's Pecific Northwest Laboratories has

summarized more than 100 studies on the health effects of the electric and magnetic radiation emitted by high voltage powerlines. Some of these reports showed no ill-effects.

even after relatively high-levels of exposure. Other studies showed that radiation levels

Ö

canage. animals, Tha University of Colorado Medical Center found that an unusual number of children who had died from cancer in the Denver area, had lived near powerlines.

Science News summarized the study in 1979 and concluded that for children who lived near up ??-0-kv lines, "the deeth rate for leukemia, tymphomas and nerous-system tumors..., was roughly byice the expected rate '

In 1975 the New York Public ServiceCommis-sion held extensive hearings on the health and safety of high voltage power linas. After review-ing 13,000 pages of testimony and hearing numerous witnesses, the commission concluded "That biological effect will probably be induced in humans exposed to overhead lines and that such effects may be harmful."

And in a review of the research done on the health effects of powerfines, which was partially financed by the American Electric Power Com-pany, It was stated that "the one firm conclusion that emerges from the existing literature is that relatively weak electric or magnetic field are capable of evoking neurophysiological or

behavioral effects" It's logical for corporation and agencies that axist and profit by selling electricity to ignore publicly the dangers of their product. Some people justify the deception by saying the convenience of electricity is worth the risk. But that is a phony argument. BPA doesn't talk about the health problems because it suspects that if the public knew, the powerlines wouldn't

be tolerated

# orrespondent Comment Stick It To Us BPA

By Bill Sansom

Interested Mineral County residents were deluged with BPA mail, some households receiving as many as eight copies, last week of the BPA Draft Environmental Impact Statement on the proposed Garrison-Spokane 500 KVTransmission Project. The 31 proposed carrison-spokante sou to transmission regist. The sa page book, containing graphs, maps, misconceptions, delusions, and BPA rhetoric, was compiled to delude the people and govern ment agencies into believing the Southern Route was the most feasible route.

Any person interested enough to read the draft EIS would see that the BPA has some good reasons fore preferring the Southern Route. Amyone angered enough to CLOSELY examine the EIS would see that the southeren route was not selected because of mental or economical impact considerations at all. It was

selected because it would be loss hassle for the BPA. The Southern Routele shorter, on a flat map, butit notthe least expensive route to build. The Hot Springs route is 4 million dollars cheaper. The Southern Route would cross 84.7 miles of private land, daturb 6.1 miles of roadbase area, cross 19.1 miles of private land, and pass through 113.0 miles of countyside that the BPA has descenting to have high visual quality. The line will refer 21.7 miles of highly productive timberland disturbing natural vegetation with a 125 foot wide corridor, not no mantion 257 miles of access reads. What will Mineral County residents get besides cheaper. The Southern Route would cross 84.7 miles of private ... sccess rosas, what will Mineral County residents get besides less timberiand, less private property, higher property taxes on what little private ground we have left, less unblemished hunting ground, and 175 foot towers in our backyards? The answer is nothing.

The last page of the draft EIS contains a very small paragraph. aimost an afterthought, that reads: "When transmission lines are replaced, the contract for construction of the new line includes perioval of the old one. Old poles, steel, and -onductor are moved and scrapped or solvaged "verfooting are removed or ried." The BPA has a line right early and are removed or ried. The BPA has a line right early a disturbed. All the access ads are built. All the notway vertour and sourced. All the Letters

So saith BPA The almighty Bonneville speak eth: My children, you have sinned in your desire tonot have our powerlines your desire tonot have our powerlines run through your valley. Therefore, we shall position our towers in your line of sight and you shall view them all the days of your life.

Your compensation for the devalu-ation of your property shall be notone

Take a look

( === 2)

alion di your property shall be notone penny. May you live in sorrow for the loss of the pristime scall of 1 your valley. I havards ser are not sure of the hash havards ser are not sure of the hash of ha buil goy. our benefactures in the prest state of Washington will be for-exer pristell for the power our lines deliver. So suits the almighty Bonneville So suits the almighty Bonneville Creek Road. Missonia.

Res nday's avdience of a bout Topeop is at the Univer-Montana HAT a group of gradit children playing a Seattle-area schoolyard at he d concern \* A it he stands and and and endst Latry Anderson, a powerline beal thef-urcher for Batlacile Pacific Northwest La borato-hland, Wash., cued up a color silde to start his Ø ",", a the scientific graftwing to-niling children appeared bildrou t soared above them acd to the so lines that sagged ver their 2 Western Montaná 0 3 3 Ω dectrical the 22 3 g S Decaue there is a specificar: he added "In Inter" Note II is all cancels that is all to be pred made the breach there each as these in the gift, Automotion and the lines are find and another the the gift, Automotion data the lines are find and another the specific the data the lines are find and another the specific the data the lines are find and another the specific the data the lines are find and another the specific the data the lines are find and the specific the data the lines are find and the specific the data the specific the specific the specific the specific the disability and specific the specific the the specific the specific the specific the specific the the specific the specific the specific the specific the the specific the specific the specific the specific the the specific the specific the specific the specific the the specific the specific the specific the specific the specific the the specific the specific the specific the specific the specific the the specific the specif Ð S σ extion." he added. "Is it safe?" wit isn't safe to speed much a those in the side, Anderson to those the Bomerulle Pomer suid across Modana to carry ŇX 0 T (Inc) applicited equipment in the work Trup at Characteristic properties opposite bit by the func-position of the Derivative opposite bit by the func-tion of the Derivative opposite bit is assure that the du-trum of the Derivative opposite bit is assure that the du-trum opposite of the results is a state which due to the Derivative opposite and the provided the dutrum opposite opposite and the provided the dutrum opposite bit is the state market and the provide the theorem is another the state market and the provide the theorem is another the state market and the provide the theorem is another the state market and the provide the theorem is another the state of the Derivative opposite the durum opposite the opposite opposite opposite the durum opposite the and the state theorem opposite of the provide theory and and the derivative opposite of the provide theory opposite opposite the and the derivative opposite of the durum opposite opposite of the and the derivative opposite of the durum opposite opposite opposite opposite of the and the derivative opposite op line owerline ( • who caref for the animals nor the researchern who form lanes which ones had been exposed to electroit and Anderson. The human could not subconsciously rated for the exposure by treating the exposed and ifferently. experts results show that the increased ne rise stration is from a begindened esculubility in the sympose. Sy-ure where nerve impulses jump from oue newon, or rerve, to abother. most "robust" results of that study, said AndeDon an increased sensitivity in the nervious systems of sed animals and a strong effect on their pineal posed animats also showed abnormali tiet in the ine pineal gand, located at the base of the brain known as the "thurd eye." the gland remains it a mynter, built throught to be the center of an logical clock, Anderson said S ŝ definite a bnormalities in prineal gland animals, especially at night, But they Q 7 -5 Ø + 1 Selection as the selection of the s The second se Ω C Φ Ŵ itions 25 `"

# Powerlines cut huge swath

The Bonneville Power Administra-tion says in its draft Environmental Impact Statement, "The Montana Major Facility Siting Act aims to mainfain and improve a clean and healthful environment for present and future generations, to protect theenvi-Reader comment

ronmental life-support system from ronmentai jit-support system irom look at an additional J.40 mileo 030-degradation and pervent unreasonable called attractive greenheit depiction and degradation ol natural resources. Bod has the thore has a strain and where. For the is the Washington State Act) are de-signed to regulate construction and alter construction of boiler. the land operation of power facilities in order to minimize advects effects upon the network above the network above the network effects upon the network above the network above the network effects upon the network above the network above the network effects upon the network above the network above the network effects upon the network above the network above the network effects upon the network above the network above the network above the network effects upon the network above the network above the network above the network effects upon the network above the

to minimum a soveral enters upon the service and the unterprocessing of the service and this about some other some other

have to sue the BPA to get it to con-form to the Major Facility Siting Act? I'll answer my own question: because the BPA does not operate in the pub-

ditor, Mineral County Sun & ditor, Mineral County our at hè Citizens of Mineral County On December 29, 1981, Kayle sckaon from Max Baucus' staff and to fellows from the Bonneville over Administration came to St egis totellus what BP A was going to egis totellus whatBPAuss going to ). Jackson str mand the fact that body wanted the powerline (twin )0KV) and said that we should stead look for visble sitematives. > thepeople atthe meeting(approx. continued next colum

The BPA intends to stash a 125-foot country mostly used by hunters and corridor through the heart of western recreationsits who have their own Montana't best inmber land. How dos bone to price with the BPA. What hap BPA describe this 280-mile.long press when a row dimutators are hold descrut in a letter to San Mas Saque out Could speris thy Could the line row who hould knowledge the the BPA would have to ppend announced in world build on to find the form those there are to avoid have to ppend in the spend build on the final the specified by the form the first and the line to avoid have been been as the specified by the announced it would build up to four miles of access roadsfor every mileof powerline. Does that mean we can look at an additional 1.040 miles of so-

Let's forget the timber aspects for

curs along the line, will the retardant planes fly over or under the lines? Will

100 personal came up with a few pleasars dds/i even have where the alignatives which should be costid-stations which should be costid-stations of the stationary of the stationary of the station to give these alignatives any costid-alignatives. Too coperities, or "wort wort". Tackson upped the BPAs temporary waid overhaad these were these alignatives on backal of \$700,000,mill and burdle years \$800. Tactuon. Tactuon per mills. I down the station of the station of the station these alignatives on backal of \$700,000,mill and burdle years \$800. Tactuon. these alternetives on behalf of \$700,000/will and burds wers \$800. Barcoa. The alternatives presented are as fillows: (a) and a statement of the statement of the statement (a) burds and the statement (a) burds the statement of the statement (a) burds the statement of the statement (a) burds the statement of the statement (b) burds the statement of the statement of the statement (b) burds the statement of the statement of the statement (b) burds the statement of the statement of the statement (b) burds the statement of the statement of the statement (b) burds the statement of the statement of the statement (b) burds the statement of the statement of the statement (b) burds the statement of the statement of the statement (b) burds the statement of the statement of the statement (b) burds the statement of the statement of the statement (b) burds the statement of the statement of the statement (b) burds the statement of the statement of the statement (b) burds the statement of the statement of the statement (b) burds the statement of the statement of the statement (b) burds the statement of the statement of the statement (b) burds the statement of the statement of th

would do all the removal work and remind youthat the people in the weak also buy the towers, one set of new and of the county had NO imput towers would be built that would not whatcover into formulating routing only accompatient he dil lineared the algorithmic That was all done by new twin 500KV but there would be BPA brass in Portland, Oregon by the versi short but inset sould be BPA brass in Portland. Oregon by search on the lowers behave looking at maps and probably made Since only one set of towers the through dark the people date which there would be heven in the public get to participate in observent towers provide. BPA planning process is disputing would exits, there would be lever to present lowers provide. I have obtain cross on the ground here would loaded? The Could be designed by status appearantly designed by status by status by status appearantly designed by status appearantly designed by status appearantly designed by status appearantly designed by status by status by status appearantly designed by status appearantly designed by status by status appearantly designed by status by status appearantly designed by status appearantly

Like' Kayler Jackson and. The equative view of the grange. The southward view of the grange. The southward view of the grange of the southward view and but we must continue to be our fight in in Resets, but this is the fight in in Resets, but this is the respond to str public before they go (or fart public before they go At the meeting, I asked Tim Nurray. Andrew Kulla, St. Regie

recreationists who have their own bone to pick with the BPA. What hap-peris when a row of insulators areashot out? Could sparks fly? Could the line short out? The BPA would have to spend thousands (excuse me. the ratepayers

would have to pay thousands) of dol-larsjust to find the problem, letalone lars just to ind the problem, letaione fix it. How do they plan to find and fix the problem in six feet of snow? Let's talk about costs. The south-ern route is about \$4 nullion more ex-pensive if you don't add the additional \$6 million cost of locating a substation in the model of non-exemptibility. in the middle of nowhere. What it Montana Power, and other private utilities, built the line? Well, counties

along the route would collect \$201.7 nullion during the life span of the project. What do we collect if BPA builds the line? ZERO builds the line? ZERO. So loggers, thank the BPA for loss of employment. Hunters, thank the BPA for lack of big game. Land-owners, thank the BPA for the attracform to the Major Facilly Sling Act<sup>2</sup> plane up over of under the uners<sup>2</sup> will be A for lack of big game. Lano, Till answer my own quotion: because ther ff y avoud or uthrough the U<sub>2</sub> over the Markace the BPA does not operate in the pub-foot tall towers<sup>2</sup> My bets they wont is interest and the BPA souther<sup>2</sup> ff at all powerine route adversely affects the proper and environment of this state. Southern route raus through provide the markace southern route route rause rough provide the markace southern route route southern route route southern route route in the provide the markace southern route route route southern route route route for the first southern route route southern route route route southern route route route for the southern route route route southern route route route for southern route route route for the route route for the route route

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### St. Regis, Montana coal) runs out. January 29, 1982 If the line must go through

Open letter to the Governor -

Dear Governor Schwinden Enclosed are copies of over

300 signatures of Mineral County residents opposed to the BPA bowerline route through our county.

At a recent meeting in St. Regis (called on very short notice) a "capacity crowd" presented its strongly united opposition to the BPA proposed 'southern route."

Ironically, back in March '81, in a letter to Senator Max Baucus, the BPA expressed the following opinion, which can also be considered a concensus of thinking by St. Regis people: "Existing powerlines with ad-

less land costs because of the previous investment in the vacant right-of-way. In addition to production. this economic consideration, the environmental weight would be affected by less requirement for new access roads and the visual difference of two adjacent powerlines compared to two separate lines west from Missoula. The alternatives along the Clark Fork Valley would require all new access and acquisition costs. The route northwest to Hot Springs would follow an existing line with a vacant right-of-way."

What exactly is the reason for not using this vacant right-ofway?

At the meeting it was further suggested that the existing lines along the "northern route" be consolidated onto one set of towers. At present # seems the BPA is authorized to scar the land with ugly towers with no provision for removing them when their usetuiness (or the

Mineral County, there is an existing vacant right-of-way along the old Milwankee Road. Why not bury the line there instead of defacing densely forested mountainous land. The cost of engineering and

. .

maintaining such a project would be astronomical, not to mention the destruction of the little wikdlife habitat left in this country.

It also seems people potentially affected by this line would be less disturbed if it were buried underground.

Mineral County has everything to lose and nothing to gain from the proposed construction. We jacent vacant right-of-way bave get no power; we lose revenue in miles of land removed from the tax base and from timber

Copies of this letter and the accompanying signatures have been sent to Senators Max Baucus and John Melcher, Congressmen Pat Williams and Ron Marlenee; the Missoulian, the Mineral County newspapers, and the BPA.

'We surely hope you can help us in this matter.

Barbara Ross

. So Miller Creek is elected to become Missoula's powerlines sacrifice area. Congratulations. You folks have just won the Hairy Dog Tail Award. The dog tail was mentioned here in an editorial Sept. 8 - the one about the guy who fended off stervation in a north woods cabin by whacking off

## **Missoulian editorial**

how boiling his good ol' dog's tall. The dog partook -Powerlines and pipelines, slurry lines and other manifestations of what misguided people term "progress" are like that good ol' dog: consuming one's own substance to live.

In the case of the Colstrip powerlines, the substance consumed, sacrificed, is the beauty of Miller Creek, not to mention the beauty of all the lands crossed by these two 500 kilovolt powerlines hanging from their 162-feet high towers. The sacrifice also involves potential emission

by the powerlines of positive ions - whose pernicious pollution mysteries are still being explored and from ozone, a better-known pollutant which might or might not be a problem once the powerlines are in use

The sacrifice will be felt in property values. Many people live in western Montana (and the Miller Creek area) because it's stunningly lovely.

Powerlines are stunningly ugly. Given a choice, who could be induced to pay top value for property whose scenic vista embraced repulsive powerline towers? Name three.

**VI-314** 

We all know these powerlines are destined to march through western Montana on their gigantic towers. That's in the cards. The Bonneville Power Administration can and will condemn land, if necessary, to clear the way. The powerlines will carry power from Colstrip coal-fired generating plants 3 and 4 to Pacific Northwest consumers.

These twin powerlines might be the forerunners of more. That future threat is of greater importance, oddly enough, than these specific powerlines. Some guestions:

 Does BPA intend to buy a right-of-way wide enough to take not only these powerlines but future powerlines? That's important because otherwise this distressing event might be repeated in the future, creating additional sacrifice areas in Missoula and the Clark Fork Valley.

• Are concerned citizens here willing to look at the long-range implications of this, in addition to the immediate distress caused by these twin powerlines? That's important too. Citizens here should lean on state and officials to insist on comprehensive planning of all future power plant and powerline development

It's late, now, to debate these specific powerlines. The Colstrip power plants are nearing com-

1-SR-1-51 pletion. Their construction, which dictated th powerlines, was cleared by the state years ago. Th debate then centered on eastern Montana, but obv ously, we all now know, it was important to wes ern Montana. Western Montanans must become it volved early in all state power plant developmenti

THERE CRES

NEIGHBORHOOD

@1981. GREG SIPLE

 What sort of federalism is it that BPA, a fee eral agency, can ram powerlines through without review under the state's Major Facilities Sitin Act? The state (and Montana Power) wanted th Colstrip powerlines to follow a different route. . What should be paid in lieu of taxes? The

federally-owned powerlines take property from th tax rolls, lower the value of adjacent property, an pay nothing in return. If privately owned, thei value would be added to the tax rolls. BPA is mul ling this question over. Payment in lieu of taxe should be decided in favor of the sacrificed area and cemented into permanent policy.

The basic issue is long-range planning - state wide, regionwide, nationwide. That planning should turn from vast centralized power plants like those at Colstrip to conservation and to development d renewable energy sources.

Otherwise the suffering due to hit Miller Cree and other areas will be afflicted elsewhere, on an on, over and over, until the beauty of Montana sacrificed to the hang-dog tail principle of "prog ress.

- Sam Reynolds

OPPOSE SPA POWERLINE

# etters

To the Citizins of Mineral County; I'm not sure if everyone in the county is sware of the fact that the Well, they are, and the roposal has main Picture a view of the f morning. . Or better, detve up Hannaker Creek to the stateline on a wet day and enjoy the servicity of

being alone in the woods. Yep! all alone with just you and all that charting you and to each tower. The BPA came to St. Regis several

private land, they'll condetion the land and Pey you for it. So you can then all under their powerfine with a thomand dollars in your pocket. Big deal. Bot don't worry about your land being devalued. They assured us the county tax assessor would value the rust of your land at its original value, just so your taxes don't decrease, explain to a potential bayer (if you decide to sell) that, the powerline doesn't develue

taxes or make payments in tien of taxes. And think of the timber land taken out of production. That should decrease the Forest Service's

3) But maybe you think you'll be able to get a job building the line. No chance. The BBA explains that ----Oh yes, they said that MAYBE some of the contractors

MIGHT hire some locals to do some menial grunt work. Thanks BPA, vou're all heart.

4) So maybe you own land out a ways andyou don't have electricity. Forget ÌL. 1

THRU MINERAL

think of it as a power express way with po offramps. 5) If you think we have too shany

woods roads already, hang on. Remember they want a road to every tower.' But that's okay, it'll help everyone else get to what might be your favorite hunting spot, just so you don't get lobely, and they were quick to point out it won't hurt the hunting. Sure, next time you're lucky enough to injun up on some elk, hum and crachle like a powerline and potice how calm the elk are. The elk will love the noise!

6) At the BPA meeting they said they'd take our comments back to their headquarters. Everyone at the meeting expressed negative comments about the BPA idea. But lunny, none of the BPA guys took notes or had a tape recorder. Maybe they memorized it all, or maybe they heard it all before.

7) The BPA points out that their agency doesn't cost the tax payers a cent. NOPE, all of their salaries and expenses are paid by the Montana Power and Utility companies.

How stapid do they think we are? Oh, it won't be anuch, the line will only cost about a million dollars a mile. That's all, And their boys (BPA) don't walk, they the helicoptors, 7 days a wask.

5) And don't impacts of these out of State and County contractors. There'll be more transferits to add bonissty and integrety to our communities. Think of all the nice people the freeway has brought us,

the routes planned )

the powerline will bring more.

(Also for your information you will BPA and maps and petitions at Castles and Stargen, Mare are in the Post Office of

Box 4327 Missoula, Mt. 59806

9) The PBA already has a right of way north of here. It's those powerlines you see when you drive up to Hot Sorings, Managementation soute it in Springs. Managementional source is a springs. And the second source of the you are going to deface the land with You can you are going to detace the tank whit powerlines you might as well put them all together. But no, we're a small county (no. 54 lasmce plate) and k's easter to pick on a little gray.

And a few years down the road they might what mother powertine. They'l figure heck, we can put it with the other one in Mineral County since we've already got a right of way dure." Thanks again BPAI Dop't got think for a second that the BPA s biding about this route. It

L-SR-1-51

COUNTY

is real and will become more and more real when they start building it in 1983. in their Enviornmental Impact Statement in NOW the time for us to get together and let. then know that this Hitle guy (Mineral County) doesn't want a powerline stuffed down our throats.

We have NOTHING to gain and LOTS to lose. How can you let them know?

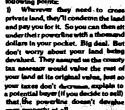
) | how it's hard someth to sit down and write, but its the only way. If you don't let them know your . feelings, they figure the fine, with us. Lat's get organized and let their know L's not so easy to step on us. Andrew Kalls, St. Regts Pat Williams

House of Representatives

- 1512 Longworth Building
- Washington, DC 20515 1-800-332-6177
- Max Reucus
- 116 Senate Washington, DC 20510 1-800-332-6106

Ted Schwinden Governor Helena, Mt. 59620

weeks back to get our input. First of they explained how they wanted to know our feelings, then they proceaded to TELL, not ask, what they would do. Commider some of the following points:



your property at all. 2) The BPA doesn't presently pay

payment in lieu of taxes.

# Valley pays heavy price for the powerlines

# **BPA Will** "Wipe Out"

Radio and TVBonneville Power Administration 5 (BPA) travanisation line through

Mineral County will "whe out" radio and television dispatision signals in Mineral County. According to McDwale the mountainous terrain and directional nature of radio and TV transmission signals pieces Mineral County communities in what is called "fringe areas". Signal a from Missouls will have to cross the path of the 500,000 volt power lines of least twice and signals from Spokane will cross the line at least once. The state electricity from these lines will likely overpower these already weak signals. Mac said that new, more powerful, reflectors could be installed to overide the signal interference but the larger more sophisticated equipment would create problems all its own. For one thing, the FCC (Federal Communications Commission) would have to approve the installation and then an alternate site for the reflectors would possibly have to be located and approved. According to McElwain, the present reflector sites were not randomly aglected but were chosen because they were the best possible sites to receive and amplify the radio signals. There may not be an acceptable alternate site in any of the communities. More than TV will be affected according to McElwain. Police communications, CB and Short Wave radio transmissions will all be affected. Powerlines have been around for a long time and people have adjusted to them. People have

The 500,000 volt power lines are going to be more than just another federal government evesore. The lines are going to create problems the entire length of Mineral County and they will be troublesome to every community. Once the power corridor is established it can be expanded.

paid for that adjustment.

Ralph McElwain has been involved in communications for almost 60 years, which is longer than the BPA has existed

It's Time To Speak Up To BPA

Now we have have the main culpre that will send out circles of magn waves from all the full length of these high voltage wires. Very much the same as the waves from a raile station. These 500,000 volt here are In comparison, a long wire ante The waves of alternating energy of similar to the waves from a valu tastand of music or TV pictures of unications between your Shertf Dept. and their patrol cars, it will be hum and noise and streaker and bars on your TV. It will blanker radio denale for miles.

Everyone who lives in these moun take know the many problems with getting radio or TV signals through. If

setting radio of TV wigness through it with the (BIG BOLZEP) is through it out chicks, I had sever that there will be TV shadow (BY and two way radio 7 must chang. There was changed to radio and communications over 50 years along with High Voltage Power Bass 15 was

Now is the time to speak up. Do youvenjoy your TV, Scanner, CB set, Short Wave or plain BC set? If you do, you do not want a 500,000 KV power line to your pasture. Write to the proper people and Signed B. Rabh McDwala St. Regia Montan

Missoula and the Clark Fork Valley are about to experience the results of Colstrin 3 and 4 centraited power plast construction. Two power lines, mounted to poles 162 or more feet high will march past, carrying power to Washington and Oregon, The penefits:

· A construction phyrol while the poles are being built.

 Some payroll for maintenance.
 The linbilities:
 Sover real estate values and lower tax collections on property near the powerlines. . No property tax collections because the pow-

erlines are being built by a federal agency, the Bonneville Power Administration.

. If pollution develops, there will be higher bealth care expenses. The powerlines also will be notsy

. Damage to the beauty of this area, which is Missoula's greatest natural strength and its best long-range bet to foster solid economic growth and stability

Western Montana is paying a heavy price for the dubious privilege of playing host to these lines.

A bitter irony is that Montana Power and the state wanted the lines to go east and north of here. That route was blocked by the Flathead tribes, who were adamant that the lines could not go through the Jocko. Montana Power lacks condemnation power on the reservation, so it asked BPA to build the lines west from Townsend.

Now BPA is recommending a route that skirts the reservation anyway! Montana Power could, have built these lines and then, at least, paid local property taxes on them.



:22 Classical Deabians Welcome Mountain Deabians by. Home of the guarenteed houses for slow, respired on please Rila Faye Professional receivings and drawings to your Landscares and enimals a socially Rila Faye Eurisgham P. G. Dox 134 Elector, Mortere 5,9825 Phone (406) 825.7377 may 27, 1982 BPA-This letter is to call to paur attention to the changes that have thefen place in the distan areas mat is affected by fam propased alternative routes-I believe they are 27, 28,29 on your maps -The anton area has developed substantially in the last 3 years - There are now 20 families living along the proposed Swarty Creek Rte, between Schwartz Creek and The Melusules Fracks - also the line would was 4 ranches - 2 cattle + hay and 2 hause rambes - one, mine speader in high quality shaw have and the other in Race haves - ST

Would put us dut of husiness to. have this line go through here, also, my family owner or holds 1st martigge - contrats on 220 acres between Schwartz Cuck and the melisake tracks, and another 230 arres adjacent to Wallace Creek, another proposed ratte there are about 20 families huising on that land also. We are 100% opposed to any of the Nattles that concern These areas arread Clinton. Speaking Jan 40 families a 450 deres of agricultural residential land Surcela Huy and 622 624 alund her

L-MC-1-(37 650 Lost Mine Loop Missoula, MT 59803 May 12, 1982 Department of Energy Bonneville Power Administration **Transmission Coordination Office** 1620 Regent Missoula, MT 59801 Atten: Mr. George Eskridge Dear Mr. Eskridge: Please add my comments to your file concerning the route for the 500 kv power transmission line. We live in the Miller Creek Valley. We have attended various informational meetings the BPA has held, and have spoken with you. We have not, however, submitted any written comments previously. Our single most important concern at this point is a common one, I'm sure: the potential health hazards. We have two young children, and many of our neighbors have kids, too. These powerlines are a gamble with the children, just like the bomb tests of the Fifties. We are so afraid that 5 years, 10 years from now, increased lymphatic, carcinoma-related diseases will show up in these kids, just as it has in Colorado. The University of Colorado Medical Center found much higher rates of those "childhood" forms of cancer in families living near the high kv powerlines. This is a sobering coincidence. Please keep considering all other possible alternatives. Think of all the kids near all the proposed transmission routes. Let the public help you. We've heard the BPA's responses, but add these comments to your statistics: Can we bury the line? Do we really need the line? What is the government's liability and/or responsibility in installing a potential health hazard near an inhabited area? We are already on the Department of Energy's mailing list for transmission line information. We would appreciate continuing to receive any updated material. Thank you. Sincerely, Inary I Hall Mary L. Hall

VI-316

61:182

| L-0M-4-819   | r   |  |
|--|---|--|
| United States Senate   | MAX BAUCUS<br>Montana   | L-0m-4-8/19  |
| June 1, 1982   | Washington, D.C. 20510<br>(202) 224-2651<br>Montana Toll Free No.<br>(1) 800-332-6106   | Lee Tavenner<br>Granite County Alliance<br>Star Route<br>Hall, Montana 59837<br>Nay 28, 1982   |
| <ul> <li>Mr. George E. Eskridge<br/>Bonneville Power Administration<br/>P. O. Box 4327<br/>Missoula, Mt. 59801</li> <li>Dear George:<br/>Senator Baucus has received the enclosed<br/>letter from his constituent, Mr. Lee Tavenner.<br/>Please note that Mr. Tavenner has submitted a list<br/>of correspondence which he would like included<br/>in the final EIS.</li> <li>Please feel free to use all the materials<br/>from Senator Baucus' office mentioned in Mr.<br/>Tavenner's letter. If we can be of any<br/>assistance, please do not hesitate to contact<br/>me.</li> <li>When Senator Baucus submitted his statement<br/>for the record he also asked that copies of certain<br/>letters be included. Since I have not seen the<br/>Senator's statement I cannot say that some of the<br/>same letters have not already been submitted.</li> <li>I appreciate your assistance in seeing that<br/>these letters are made part of the record.</li> </ul> | Committees<br>Environment and<br>Public Works<br>Finance<br>Judiciary<br>Small Business   | Mike Cooney<br>Senator Max Baucus's Office<br>Room 256, Federal Building<br>Butte, Montana 59701 Dear Mike, Thanks much for the help on the Jerry Frick letter. I may<br>going overboard, but I think the more specific language is<br>important to us, and that from our past experience we are<br>going to have to keep up the pressure to get the job done. Enclosed is the list of letters that we have requested<br>BPA include in the final EIS on the powerline. I would appreciate<br>your forwarding to BPA permission to use those letters on the list<br>from or to you or from or to Max Baucus that are not already<br>of public record. Sincercly,<br>M.M.M.M.M. |
| Mike Cooney<br>Staff Assistant<br>Room 256, Federal Bldg.<br>Butte, Montana 59701<br>CC: Lee Tavenner<br>Enclosure   | Billings<br>657-6790<br>Bozeman<br>586-6104<br>Butte<br>782-8700<br>Great Falls<br>761-1574<br>Helena<br>449-5480<br>Missoula<br>728-2043 |  |

VI-317

# L-0m-4-819

Lee Tavenner Assistant Chairman Granite County Alliance Star Route Hall, Montana 59837 May 28, 1982

Mr. George Eskridge Bonneville Fower Administration Fransmission Coordination P.O. Box 4327 Missoula, Mantana 59806

# Dear George:

The following is a list of letters that the Granite County Alliance requests be included in the final EIS:

# <u>Alliance</u>

| 10/12/81 | Adele Furby to George Eckridge                             |
|----------|--|
| 11/17/81 | Mrs. Carl Cassidy to George Eskridge                       |
| 1/18/82  | Evelena Anderson to George Eskridge (including resolution) |
| 1/25/82  | Clayton Herron to George Eskridge                          |
| 2/4/82   | Adele Furby to George Eskridge                             |
| 2/5/82   | George Eskridge to Clayton Herron                          |
| 3/16/82  | George Eskridge to Adele Furby (process)                   |
| 3/22/82  | Lee Tavenner to George Eskridge (EIS information)          |
| 3/25/82  | George Eskridge to Lec Tavenner (EIS information)          |
| 3/25/82  | Lee Tavenner to George Eskridge (hearing location)         |
| 3/29/82  | Lee Tavenner to George Eskridge (EIS information)          |
| 3/30/82  | Lee Tavenner to George Eskridge (process)                  |
| 4/8/82   | George Eskridge to Adele Furby (public meeting approach)   |
| 4/9/82   | George Eskridge to Lee Wavenner (hearing location)         |
| 4/9/82   | George Eskridge to Lee Pavenner (process)                  |
| 4/9/82   | George Eskridge to Lee Tavenner (E1S information)          |
| 5/21/82  | Jerry Frick to Lee Tavenner                                |
| 5/21/82  | Jerry Frick to Lee Tavenner, revised                       |
| 5/28/82  | Lee Tavenner to George Eskridge (letters)                  |
|          |  |

-continued-

-2-

L-0m-4-\$19

# Congressional Delegation

| 1/18/82             | Evelena Anderson to John Melcher             |  |
|---------------------|--|--|
| 1/18/82             | Evelena Anderson to Max Baucus               |  |
| 1/18/82             | Evelena Anderson to Pat Williams             |  |
| 2/1/82              | Pat Williams to George Eckridge              |  |
| 2/19/82             | George Eskridge to Pat Williams              |  |
| 2/25/82             | Max Baueus to Clayton Herron                 |  |
| 3/3/82              | Pat Williams to Clayton Herron               |  |
| 3/3/82              | Pat Williams to Lee Tavenner and Adele Furby |  |
| 3/15/82             | Adele Furby to Mike Cooncy                   |  |
| 3/23/82             | Adele Furby et al to Max Baucus              |  |
| 3/23/82             | Adele Furby et al to John Melcher            |  |
| 3/24/82             | John Melcher to Lee Tavenner                 |  |
| 3/29/82             | George Eskridge to Max Baucus                |  |
| 3/31/82             | Mike Cooney to Adele Furby                   |  |
| 4/2/82              | Adele Furby to Mike Cooney                   |  |
| 4/2/82              | Pat Williams to Wes Kvarsten                 |  |
| 4/12/82             | Max Baucus to Lee Tavenner                   |  |
| 4/13/82             | Wes Kvarsten to Lat Williams                 |  |
| 4/16/82             | Pat Williams to Adele Furby                  |  |
| 4/30/82             | John Melcher to Lee Tavenner                 |  |
| 5/11/82             | George Eskridge to Max Baucus                |  |
| 5/19/82             | Mike Cooney to Adele Furby and Lee Tavenner  |  |
| U.S. Forest Service |  |  |
|                     |  |  |

## 1/28/82 Charles Miller to Forect Supervisor 2/3/82 Lee Tavenner compents on the Forest ID Tcam evaluation 2/4/82 Adele Furby to Charles Miller (including position statement) 2/11/82 Lee Tavenner to Howard Challinor 2/22/82 Lee Tavenner to Charles Liller 3/5/82 Beverly Skinner et al to Charles Miller 3/11/82 Adele Furby to Jack Fischer 3/11/82 Adele Furby to Charlee Miller 3/11/82 Adele Furby to Vic Standa

L-0m-4-819

- 3-

| 3/12/82 | Charles Miller to Forest Supervisor |
|---------|-------------------------------------|
| 3/15/82 | Lee Tavenner to Charles Miller      |
| 4/8/82  | Adele Furby to Charles Miller       |
| 4/27/82 | Charles Miller to Forest Supervisor |

Correspondence with BPA should be available in your files. Correspondence with the Forest Service should be available in your files or through the Forest Service as a cooperating agency. Copies of other correspondence is enclosed.

We also request that all other letters regarding the Taft route in the Flint Creek Valley that you received after the Drummond scoping meeting that were not specifically included in your scoping summaries be included in the final EIS.

Thank you.

Sincerely Control F. Lee Tavenner Assistant Chairman Granite County Alliance

OFFICIAL FILE COPY United States Senate MAX BAUCUS /Dale 0/55,1UN 1 1982 Montana sor bone es Action Taken ANS. DIC REPLY a hington, D.C. 20510 Dete (202) 224-2651 tana Toll Free No. May 27, 1982 (1) 800-332-6106 Mr. Peter Johnson, Administrator Bonneville Power Administration P.O. Box 3621 Portland, Oregon 97208 Dear Mr. Johnson: I write to summarize my concerns over the Garrison-West siting of Bonneville's proposed powerlines. Rather than repeat earlier, more specific remarks here, I request that our earlier correspondence be included in your hearing record and that BPA's siting decisions respond to the concerns I have raised separately in correspondence over the past year. Committees Instead, I will here summarize what I believe to be the Environment and most important criteria for siting these lines: Public Works Finance 1. Recent changes in the forecasted power demand for Judiciary the Pacific Northwest raise questions about the continued Small Business need for power generated by Colstrip Units 3 and 4. The changes will require a new look at the extent to which Bonneville's further involvement with these lines is necessary. As part of the EIS process, Bonneville should thoroughly review the "no federal line" alternative. Bonneville should thoroughly examine whether or not there is at this time a need for BPA to construct portions of this line. With the many demands being placed upon BPA's resources -- including conservation, fish habitat enhancement, and Treasury repayments -your agency has an overwhelming responsibility to avoid projects that are not clearly essential. If Bonneville cannot determine a clear case of existing need for federal construction, Bonneville should advise the private consortium constructing Colstrip 3 and 4 of their option to construct these lines themselves or to await the establishment of such a need once the Regional Power Planning Billings Council has developed its plan. 657-6790 Bozeman 2. Bonneville should respond to all siting concerns raised 586-6104 by the State of Montana. I am convinced that had BPA recognized the Montana Major Facility Siting Act as the governing authority Butte 782-8700 for line siting from the outset, many -- perhaps all -- of today's problems with line siting could have been avoided. Any Great Falls 761-1574 Helena 449-5480 Missoula

Missoula 728-2047 Mr. Peter Johnson Page 2 May 27, 1982

decision made by Bonneville at this time should reflect the intent and spirit as well as the letter of the recent court decision. BPA should cooperate fully with the State of Montana in making all further siting decisions. Nothing in federal law precludes full cooperation with the State.

3. The specific concerns of local residents should be paramount. Line siting costs should be paid by the consumers of the electricity being transmitted by these lines. Impact aid authority should be used flexibly to mitigate all line impacts. It is not adequate for Bonneville to base siting decisions primarily upon cost factors. The question is not "how much" the lines cost, but who should pay the costs associated with the line construction.

I am particularly concerned about local residents whose lives and property would'be affected by the lines and yet who are not entitled to payments under Bonneville's existing compensation policies. Every unmitigated local impact means shifting line costs from electricity consumers to local residents. Accordingly, BPA should relocate, redesign, and, if necessary, bury the lines to avoid high impacts. If Bonneville finds such activities to be cost-prohibitive, Bonneville should provide adequate compensation to affected residents and local governments -even if these residents and governments do not have property within the lines' rights-of-way. If Bonneville does not wish to use its discretionary authority to do this, it must refurn construction to private enterprise immediately.

4. Since Bonneville, as a federal agency, has agreed to build these lines, it is reasonable to expect that these lines be located upon federal lands to the maximum extent possible.

5. Bonneville should closely review all local initiatives and proposals for center line routing. I am particularly concerned about reports from several effected communities that local concerns are not being considered adequately. I will take this opportunity to make clear for the decision record that especially with regard to the Maxville, Miller Creek, St. Regis and Thompson Falls areas my repeated requests for more and improved meetings between lo al residents and Bonneville personnel have met with only l' ited success. Further, I have had repeated indications that Bc neville has not to date responded to particular routing ideas and problems raised by local residents. Mr. Peter Johnson Page 3 May 27, 1982

I repeatedly have requested that in these and other problem areas Bonneville adopt a policy that requires briefing local residents on the particulars of the draft EIS, then helping the residents organize and present their responses, and only then, after adequate time for review and response, holding the formal EIS hearings.

Bonneville has strongly resisted this request. Furthermore, local residents have repeatedly registered both procedural and substantive complaints concerning the line siting process. Recently, it required intervention from my office to secure Bonneville's agreement to accept pre-comment period written comments offered by local residents as a part of the hearing record. Bonneville had advised Maxville area residents that residents would need to duplicate and resubmit their earlier comments if these comments were to be considered during the formal EIS process. This is one of many times when requested and anxious citizen involvement, often combined with congressional intervention, was needed to prod Bonneville into doing what it should have done on its own.

In fairness, BPA personnel say such an apparent lack of responsiveness was inadvertent and local concerns will be explored thoroughly. Bonneville has taken a number of steps over the past year to make its process more responsive and its people more available to the public. Nevertheless, it is essential that the final environmental impact statement show clearly and specifically how each of the local concerns and ideas has been addressed.

6. Bonneville should speed its study of potential health and safety impacts of high voltage transmission lines. The Library of Congress review undertaken last year at my request indicated that too little study had been completed to gain confident knowledge of all potential health and safety impacts of such lines. Bonneville's study should be concluded as quickly as possible, its result published, and its recommendations, if any, promptly pursued.

Let me restate my dismay with Bonneville's overall record concerning these powerlines. This record began with Bonneville's being less than candid in outlining its intentions to Congress. The record continued with Bonneville's stretching its authority to, or in my opinion beyond, its legal authorization for construction of these lines. Bonneville has fought the State of Mr. Peter Johnson Page 4 May 27, 1982

Montana instead of cooperating with it. And Bonneville's siting process, while greatly improved over the past year, has improved only as a result of direct and constant pressure. Even in its improved state, Bonneville's siting process is far less than perfect.

I appreciate and respect the dedication of many of Bonneville's personnel who have honestly tried to improve Bonneville's responsiveness to Montana needs. However, I find myself moving away from support of Bonneville's historic work in bringing electricity to the Northwest toward a new and deep-felt skepticism of projects Bonneville undertakes. My State is receiving quite an education in the workings of a large, cumbersome federal bureaucracy that intervenes in our lives but seems responsible to no one.

I hope the creation of the Regional Power Planning Council becomes a major step forward in making Bonneville more responsible to Montana and to the region. This was the intent of Congress. Further, I hope that all of us have learned from this experience to review more carefully the granting of any Montana permit to construct major facilities such as Colstrip 3 and 4.

The Montana Board of National Resources had no way of knowing that the transmission lines it agreed to as part of the siting of Colstrip 3 and 4 would never be built -- that instead the consortium of utilities led by Montana Power Company would wash its hands of these powerlines at Townsend, Montana, west. In the future, it would seem clear that any permits for major facilities should be made conditional upon the original applicant's completion of all the work. And in the future, we must be careful to insure that private utilities and others seeking to construct major projects in our State are held responsible for all of the implications of their projects.

For the present, 1 urge Bonneville to use this last part of its siting process to improve upon its record in my State. The National Environmental Policy Act was enacted by Congress in an attempt to make federal agencies truly responsive to the citizens they are to serve. In this case, Bonneville's responsibility is not just to electric consumers in the Pacific Northwest, nor just to the consortium of private utilities and the public which these utilities serve. Bonneville's responsibility is also to each local resident being affected by its actions. Bonneville should Mr. Peter Johnson Page 5 May 27, 1982

move the lines as necessary to meet local objections. Bonneville should internalize the cost of these lines instead of dumping the burdens of land depreciation and associated impacts on the backs of local residents. Bonneville as a federal agency has a special obligation to cooperate -- not to fight -- with the government of the State of Montana.

With best personal regards, I am

Sincerely,

Nat Bons



P.O. BOX 794, RONAN, MONTANA 59884 Arthur S. Aylesworth P.O. Box 794 Ronan, Montana 59864

# NORTHWESTERN NATIONAL LIFE INSURANCE COMPANY

MONTANA AGENCY • KALISPELL DISTRICT ART AYLESWORTH • SALES REPRESENTATIVE OFF: 406 • 676 0300 RES: 406 • 6768100

April 23, 1982

Mr. Franklin Worth P. E. Bonneville Power Administration P. O. Box 3621 Portland, Oregon 97208

Dear Mr. Worth;

**VI-322** 

I visited with you last week at a hearing in St. Regis, Montana. The purpose of our discussion was the proposed 500kv line which your maps show as passing directly over my home 2½ miles east of St. Regis on Highway Route 135. My property is riverfront property below the highway and railroad. I am opposed to this particular line route for several reasons which I have listed.

- 1. I do not want this line over my home or within 500 feet of it.
- 2. In dry years, we have a problem with grounding the power line that feeds our property at the present time. We get electrical shocks from water faucets and switch boxes even though they are properly grounded. My electrician says your line running through this area will complicate this problem and will certainly make it worse.
- 3. The property I own will certainly be devalued in the mardetplace if this crosses over it. While it is ideal as subdivision at this time, it would lose its appeal for that purpose with this line running over it. Not only would I lose property to the line right of way, but also to the value of the remaining land and my home.
- 4. It would appear to me that you would need one tower in the flood plain across the river from my property. This appears to be a very dangerous loc location to me.
- 5. A line in this area would certainly infringe on the air space needed for the private air strip located at St. Regis.

Sincerely,

UNITED STATES DEPARTMENT OF AGRICULTURE FOREST SERVICE P.O. Box 2417 Washington, D.C. 20013

# JUN 4.1982

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Mr. Peter T. Johnson, Administrator Bonneville Power Administration P.O. Box 3621 Portland, OR 97208

Dear Mr. Johnson:

We appreciate the opportunity to comment on the Garrison-Spokane 500 KV Transmission Project Draft Environmental Impact Statement. Our specific comments are:

1. Table 1.1 (facing page I-10) should be updated with BPA's newest load growth estimates, as they are considerably different than those displayed in the table. An accompanyment to the table explaining new generation sources, capacity and planned date of energization would be helpful in putting this project in perspective, especially in light of curtailments and delays associated with the WPPSS projects.

2. The presentation of the present net values for timber are somewhat misleading (page IV-13). The values shown represent only the value of future stands that would be lost and do not include values of currently merchantable timber that would be utilized. In other words, the values represent productive forest lands that are currently nonstocked (due to harvests) or stocked with nonmerchantable trees. The discussion should be rewritten to clarify this.

3. The impact of line location on forested lands needs to be expanded to include the restrictions imposed on slash disposal and big game winter range burning to avoid flash-overs. An estimate made on one Ranger District indicates that in excess of 700 acres of winter range treatment may be forgone due to the location of the transmission line. The mitigation to relieve this situation would be very expensive slash removal in timber harvest areas; curtailing electric transmission while burning near the line; and, in the case of winter range, the substitution of hand labor and use of herbicides in lieu of burning.

4. The Recreation Corridor Impact Map does not properly reflect the impacts on dispersed recreation on the Deerlodge National Forest. The map should reflect moderate to low impacts along most of the corridor instead of no impact.

5. The transmission line overlay for the Hayden Creek (Idaho) area needs to be changed to reflect the new locations on National Forest System lands. Mr. Peter T. Johnson, Administrator

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6. There are several areas that deserve further study before final location is determined. These include Maxville, Rock Creek, Blue Mountain and St. Regis, all in Montana. We would be happy to participate in the analyses or studies since they would affect National Forest System lands.

7. Two visual analyses reports "St. Regis, February 1982," and "A visual Assessment for the Lolo National Forest, April 1982," have been submitted to BPA. The April 1982 report contained selected points on the Lolo and the Idaho Panhandle National Forests. The conclusions of these reports should be incorporated in the proposed mitigation in the FEIS. It should be noted that these reports do not represent a complete visual analysis for National Forest System land, and are applicable only to the areas identified in the reports.

8. The location of the potential Taft substation site needs further study to identify alternative sites. The present location would have high impacts on riparian zone management and water quality that can only be successfully mitigated through relocation. We wish to work with you to resolve these impacts.

9. The need to use herbicides to control vegetation on the transmission line right-of-way has a generic justification that may not be applicable to this project, especially east of the Idaho-Montana State line (see page IV-7). The use of herbicides concerns many people, and its use should only be advocated when the growth of deciduous vegetation justifies it. The potential use of herbicides can be better addressed in the section "Discussions" starting on page IV-25.

Sincerely,

7. Dale Radente

For ; R. MAX PETERSON Chief

0 STASION OF PO TER MANAGES INF Date JOHN L. WOZNIAK, CLU 1-545 6 Re arred to: Action Taken: -May 25. 1982 Chias. ONO Reply Date Public Involvement Coordinator Bonneyille Power Administration P.0.Box 12999 Portland, Oregon 97212 Dear Str: Dualing with the BPA has been one of the most frustrating experiences I have ever dealt with. You continually spend our tax dollars advertising, talling us, 'please give us your input'. At this time I have not seen or heard one commant that would favor your planned transmission lines through western Montana. Everything that I read and everyone that I talk to is opposed, not only to what you are doing but to the way you are doing it. With public sentiment running decisively against the BPA and its transmission lines, it looks like we're going to get them anyway and we're going to get them exactly the way the BPA wants things done. I want you to know that I am strongly opposed to the building of the lines. I'm sure if this was done democratically the lines would never be built at all. Sincerely Ph & wini-John L. Wozniak, CLU JLW/smw

CC: Congressman Pat Williams

LINGOLNIAATIONAL BALEB CONFORATION OF MONTANA 2000 RUSSELL P. O. BOX4207. MCSTDUA./MCNTANA/50808 (409) 728-7210 / Rus. 273-6341

REGISTINGED REPRESENTATIVE

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L-EW-5-648



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION VIII 1860 LINCOLN STREET DENVER, COLORADO 80295

## JUN 1 4 1982

Ref: 8M0

Mr. George Eskridge Bonneville Power Administration Transmission Coordination Office P.O. Box 4327 Missoula, Montana 59806

Dear Mr. Eskridge:

We have completed our review of your Agency's draft EIS on the Garrison-Spokane 500 kV Transmission Project. We have found the draft EIS to be generally straight forward and candid in its analysis of the impacts of the proposed transmission lines. Also, we are pleased to see BPA's willingness to fully analyze alternate routings for this controversial project.

According to EPA's rating system for draft impact statements, this EIS is rated ER-1 (environmental reservations - sufficient information). Our reservations concern the impacts related to the large scale ground disturbance that will occur and to other factors listed in our specific comments.

Our specific comments are found in the Attachment. If you have any questions, please contact Mr. Gene Taylor in our Montana Office in Helena, at FTS 585-5486.

Sincerely yours.

Attachment

# 6-Eu-5-648

## ATTACHMENT

## EPA COMMENTS ON GARRISON - SPOKANE 500 kV TRANSMISSION PROJECT

## Conservation

The Bonneville Power Administration (BPA) states (p. II-29) that since the State of Montana issued a certificate of need for the Colstrip generating plants and since they are now under construction, "the issue of conservation as an alternative to the production of Colstrip power is considered to have been resolved." The ELS goes on to point out (p. II-30) that conservation also is not an alternative to the transmission line.

As the BPA knows, energy forecasts for the northwest area have recently been revised downward. The "mothballing" of two partly constructed nuclear generating plants and the postponement into the 1990's of Montana Power Company's Resource 89 Project attest to not only the economic situation, but to people's willingness to conserve when faced with escalating energy costs. The State of Montana's previous ruling was based on now outdated forecasts and is some seven years old. For this reason we believe the EIS should directly address the conservation issue in light of today's revised forecasts. This question is central to the whole transmission line issue and an up-to-date discussion on it would be most heloful.

## Utility Corridor

We would emphasize the importance of the transmission line decision to the future of eastern Montana for additional coal-fired generating plant development. That is, as the northwest's hydro plants are converted to peaking facilities, a need for baseload generators becomes more important. If this "scenario" takes place, then the transmission line routing made through the present EIS may well be the routing for other east-to-west facilities in the future.

We commend the BPA for including an analysis of the suitability of the three alternate 500 kV line routes for future use as "energy corridors." We do think this issue should be given more emphasis in the EIS and the possible future ramifications of route selection better explained.

## Herbicide Use

The preferred alternative (Taft Plan) also crosses the highest number of municipal watersheds. We encourage the BPA to minimize use of herbicides in these situations. A more complete discussion of BPA's practices in regards to vegetation management and to their current efforts underway in the area of integrated pest management would help clarify this often controversial issue.

L-EN-5-648

-2-

# Water Quality

The preferred alternative (Taft Plan) would result in less sedimentation than the other alternatives even though it crosses more steeply sloping land. This would be true apparently because this routing crosses fewer areas of "problem" soils. We do not dispute BPA's analysis of potential sedimentation of the various alternatives, but would point out that the above would probably be true only if stringent erosion control, including project follow-up, is carried out by the BPA and its contractors.

The quality fisheries and presence of numerous municipal watersheds make strict erosion control most important to this project. We endorse all erosion control described in the EIS and believe these measures should be made part of all construction contracts. We also recommend all contract work be closely monitored and, if necessary, stopped or altered if excessive erosion is resulting.

# United States Department of the Interior

L-00-5-250

OFFICE OF THE SECRETARY PACIFIC NORTHWEST REGION 500 N.E. Multnomah Street, Suite 1692, Portland, Oregon 97232

ER 82/563

June 14, 1982

George Eskridge Bonneville Power Administration Transmission Coordination Office P. O. Box 4327 Missoula, Montana 59806

Dear Mr. Eskridge:

Comments from the Bureau of Indian Affairs, Flathead Agency, were received too late to be included in our original letter dated May 24, 1982. They are as follows:

Table 2.4, Alternatives including the Proposed Action, Disadvantages, No. 6, states, "no adverse effect on endangered or threatened species." The proposed powerline will cross through grizzly bear foraging areas from the Flathead Reservation boundary to where it will cross U.S. Highway 93. We reference the Bureau of Indian Affairs Finley Logging Unit environmental assessment for impact analysis.

Table 2.2, Comparison of Alternatives: Data Summary, states that for Plan A, 1.9 miles of line for both Route Al and Route A2 will go through grizzly habitat. The line will actually traverse about five miles of grizzly foraging area for either route.

Map Volume, Appendix C, Hot Springs - Bell Study Area, Hydrology: Surface Water, fails to identify Finley Creek and its several tributaries as perennial streams. It also fails to identify the north and east forks of Valley Creek as perennial streams. Additionally, there are sloughs and springs immediately east of Dog (Rainbow) Lake at the head of Cottonwood Creek which are not identified.

Map Volume, Appendix C, Hot Springs - Bell Study Area, Hydrology: Special Features, fails to list the Jocko River, Finley Creek, and Lower Valley Creek as high value fishery streams.

Map Volume, Appendix C, Hot Springs - Bell Study Area, Land Productivity: Forest, underestimates productivity class ratings from Evaro to Arlee. Much of the land is Douglas-fir/VACA, grand fir/ CLUN, or grand fir/LIBO habitat types. Thinning investments have been made or are being made along most of the proposed right of way. Also, thinning investments have been made along most of the proposed right of way from Hot Springs to Dog (Rainbow) Lake. L-00-5-250

The use of cubic meters per hectare as a measurement of productivity, as opposed to cubic feet per acre, is inconvenient, as most productivity is still measured by cubic feet per acre. Please reference Appendix A, Methodology.

Map Volume, Appendix C, Hot Springs ~ Bell Study Area, Wildlife: Big Game Sensitive Habitat: Wildlife: Peregrine Falcon: Wildlife: Bald Eagle; Wildlife: Osprey; Wildlife: Grizzly Bear; Wildlife: Waterfowl, all fail to mention the Bureau of Indian Affairs, Wildlife Branch, as a source of information for on or adjacent to the Flathead Reservation resources.

Indian concerns have been listed in the draft environmental impact statement, however, saying that they were given a fair presentation would not be accurate. This is especially true in the several instances where the draft refers to the "potential difficulty of crossing the Flathead Reservation," as opposed to saying, "the concerns of the Confederated Salish and Kootenai Tribes relating to health and safety issues, jurisdiction, legal issues, environmental issues, social and economic considerations, etc.," with a presentation and discussion of each. The Confederated Salish and Kootenai Tribal Council should not be perceived as a problem to be dealt with, but given the respect and consideration due to the governing body of the tribal membership, the tribal homeland and of all the resources found there.

Sincerely, Charles S. Polityka

Regional Environmental Officer

# **MINERAL COUNTY PLANNING BOARD**

PLANNING DIRECTOR: Jack Wright

PHONE (406) 822-4632

POST OFFICE BOX 281 SUPERIOR, MONT. 59872

Mr. Dan Bisenius Bonneville Power Administration Route EVHE P.O. Box 3621 Portland, Oregon 97208

August 6th, 1982

RE: St. Regis Montana Re-route of 500 KV Powerline

## Dear Mr. Bisenius,

I enjoyed our phone conversation today concerning the possible re-route of BPA's proposed 500 KV line near St. Regis, Montana. The route shown in the draft EIS is entirely unsatisfactory from a number of standpoints. With 88% of Mineral County's land in tax exempt status we were distressed to see such valuable land removed from potential uses other than agriculture. The draft EIS route also would significantly lessen the environmental quality of the St. Regis Landing recreation site. This site, located on the large peninsula just upstream from the proposed crossing of the Clark Fork River, has been coveted for years as a site for a park/ recreational area. We identified this site as our top acquisition priority for river oriented recreation sites (HUD funded: "Clark Fork Recreational Corridor Study, 1980" and "Clark Fork Recreational Corridor, Implementation Plan, 1981"). Since that time the Montana Dept. of Fish, Wildlife and Parks has acquired 20 acres on "The Landing" and is in the process of securing 20+ more acres. So our goal will very soon be realized. This long standing wish for recreational use of the site would be "rained on" pretty hard by the close proximity of a 500 KV line. The visual degradation alone would be enormous.

The residents of the St. Regis area are very upset about the possible despoilation of "The Landing". They are also furious about the route across private lands. The Tamarack Park subdivision was platted on land in the path of the line. Lot owners and others in the area feel that their investment in land will be ruined unless the line is moved. Public sentiment would be greatly reduced should BPA do the prudent and environmentally "right" thing and relocate the line.

The re-route which has been discussed would involve State of Montana and USFS land to a much larger degree than the draft EIS route. I heartily support the proposed reroute which would take the line near Tamarack Hill and across the Tamarack Creek area. Local residents, including the owners of the Johnson Ranch up Tamarack Creek, also support this change. The Mineral County Planning Board has instructed me to convey their unanimous support for the re-route. We all feel that BPA has been presented a golden opportunity to accomodate local public opinion and move the line off private lands and away from the St. Regis Landing park.

I urge you as Team Leader to carefully evaluate this issue. I sincerely hope that you will arrive at the same conclusion as the people of Mineral County and recommend a re-route near St. Regis. We would be grateful as hell if you did.

Sincerely, Jack Wight Jack Wright, Planning Director

DOE/BP - 150 VOLUME II

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