UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 900
Seattle, WA 98101-3140

OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

April 22, 2013

Tish Eaton
Project Environmental Lead
Bonneville Power Administration–KEC-4
P.O. Box 3621
Portland, Oregon 97208

Re: Comments on the DEIS for Hooper Springs Transmission Project.
EPA Project Number 10-034-BPA.

Dear Ms. Eaton:

In accordance with our responsibilities under the Clean Air Act §309 and the National Environmental Policy Act, the US Environmental Protection Agency has reviewed the Bonneville Power Administration Draft Environmental Impact Statement for the proposed **Hooper Springs Transmission Project** CEQ no. 20130052, in Caribou County, Idaho.

The DEIS analyzes potential environmental impacts of a proposal to construct, operate, and maintain a 115-kV transmission line and a 138/115-kV substation on a site adjacent to the PacifiCorp's existing Threemile Knoll Substation near the City of Soda Springs, Caribou County, Idaho. Construction of the 32-mile power line would involve public lands administered by the Caribou-Targhee National Forest, Bureau of Indian Affairs, Bureau of Land Management, and other lands under State and private ownership. Project activities would include access road construction and improvements, right-of-way vegetation clearance and earth moving during site preparation for structures and other facilities. There would also be hillside cuts or fills where construction activities would occur in steeply sloped terrain and blasting in rocky areas. If implemented as proposed, the project would address current concerns about power stability and reliability in southeastern Idaho and help to meet ongoing and future power needs in southern Idaho and surrounding areas.

Analysis of impacts from the project considered two action alternatives i.e., a North Alternative, including two route options; a South Alternative with four route options; and a No Action. Each alternative would begin at the proposed Hooper Spring Substation and end at the proposed connection facility with Lower Valley Energy's existing transmission system in northeastern Caribou County. The draft EIS does not identify a preferred alternative and route option(s).

We note with appreciation that the DEIS addresses many of the issues we raised during the project scoping period in August 2010, including analysis of cumulative and climate change effects. Thus, we commend BPA staff for working with a variety of stakeholders and considering public comments in the NEPA analysis for the project. The DEIS document includes a good description of resources in the project area, anticipated impacts, and mitigation measures to offset the impacts. In particular, we appreciate information provided in section 2.6 (p. 2-33) comparing alternatives, their impacts to various resources and associated mitigation measures, and cost. Overall, most impacts by the project would be due to construction activities, which would generate both temporary and permanent impacts related to the project

footprint and long-term operations and maintenance. Our concerns with the project relate to its potential impacts to water quality, land use and farmlands, and other resources as discussed below.

Water Quality Impacts

The DEIS indicates that water quality may be adversely affected if the project construction activities (blasting, surface grading, excavation, and surface pavement) alter the hydrology of springs and surface runoff such that erosion carries sediment and pollutants to local drainages (p. 3-115), accelerating infiltration and migrating through soils to the underlying aquifer. We note that mitigation plans would include implementation of erosion and sediment controls. However, the project will cross many drainages and the combination of riparian vegetation and other vegetation removal, earth moving activities and associated erosion and sediment loading could exacerbate water quality conditions in streams already on the State of Idaho's 303(d) list due to exceedances of water quality standards for temperature, sedimentation and other pollutants (p. 3-111). In addition, groundwater extraction in the area, land disturbance, material storage, waste disposal, inadvertent chemical or hazardous liquid spills, and compaction produced by vehicular traffic can all affect recharge to the local aquifer and groundwater quality.

Because of such potential impacts to water quality, we recommend that BPA continue to coordinate with Idaho Department of Environmental Quality and Tribes affected by the project to assure that the state and tribal water quality standards will be met during implementation of the project, and monitor as appropriate to assure protection of water quality. We also recommend that the final EIS include information about compliance with Water Quality Restoration Plans that function as BPA's share of implementing relevant Total Maximum Daily Loads, such as the Blackfoot River TMDL, designed to meet State and Federal water quality rules and regulations in the planning area. Since the project also anticipates obtaining Clean Water Act § 401 and 404 authorizations, and a National Pollutant Discharge Elimination System permit for planned construction activities likely to disturb one or more acres, the final EIS should include updated information on those permit application processes and recommended measures to protect water quality.

We note that BPA will consult with the US Fish and Wildlife Service, as moderate, long-term fish habitat impacts are anticipated in fish-bearing streams during implementation of this project (p. 3-158). We recommend that the final EIS include outcomes of that consultation and recommended measures to reduce risks to species within the analysis area to protect biota and habitat.

Land Use and Farmland Impacts

The DEIS indicates that the proposed project would impact federal, state, tribal and private lands and their associated uses, including lands that have been designated as prime farmland and lands managed under the United States Department of Agriculture's Conservation Reserve Program (p. 3-27). Even though some areas would be disturbed temporarily and restored afterwards, other impacts would be permanent because of structure footing and access road beds and structures. As an example, under the South Alternative, the transmission line ROW for Option 3 would impact about 126 acres of prime farmland, while Options 1 and 2 would affect 33 acres each and almost 77 acres for Option 4 (p. 3-104). We note that BPA will be consulting with the Farm Service Agency in assessing the project impacts to prime farmlands and CRP lands. We recommend that the final EIS include outcomes of those consultations and recommended measures to avoid and reduce impacts to those lands.

Regarding mining land use within the project corridor and vicinity, the DEIS states that the project would cross several existing or proposed mines, some of which are currently under investigation as Superfund

sites under the Comprehensive Environmental Response, Compensation, and Liability Act (p. 3-17). Section 3.13 further discusses the areas and potential public health and safety impacts (p. 3-211). The DEIS states that impacts could be moderate to high if project construction activities come into direct contact with waste dumps, seeps, or mine pits, exposing workers and the environment to contaminants, (p. 3-214). We recommend that the final EIS include a more in-depth discussion of the data and/or studies that support the conclusions. The final EIS should clarify the use of the term "Superfund Site" by explaining that some of the mine sites are being addressed using CERLCA legal authorities, but are not on the Superfund National Priorities List. We also recommend that the final EIS include additional clarifying information to support the statement that the project construction could encounter hazardous waste, since most mine wastes in the area are Bevill Exempt. For more information on Superfund Sites, please feel free to consult the EPA Superfund Program. Our Remedial Project Manager in Idaho is Mr. Dave Tomten who can be contacted at (208) 378-5763 or tomten.dave@epamail.epa.gov. Physical hazards may also pose a risk to the public if dangerous areas such as pit highwalls are accessible; mitigation for such hazards could include control measures such as gates, fences, or signs.

Vegetation and Wildlife

Section 3.4.2 and 3.4.3 discuss impacts to vegetation resources and indicate that the proposed project would directly affect vegetation communities through trampling and removal due to construction of the transmission line, access roads and workspaces. Some impacts would be temporary, while others would be permanent. Since thermal modification and sedimentation are the primary cause of streams not supporting beneficial uses in the project area, we are concerned that vegetation removal along waterways could result in streambank scouring, erosion, poor drainage and loss of soil and wildlife habitat. Therefore, we recommend that such areas be targeted for active restoration to increase vegetation cover and improve thermal conditions in stream channels.

Transmission Line Monitoring

The proposed project has the potential to impact resources within the proposed corridor for a long time. Therefore, we recommend that the final EIS describe a monitoring program designed to assess both impacts from the project and the effectiveness of the proposed mitigation measures for the impacts. The document should also indicate how the program would use an effective feedback mechanism to assure environmental objectives would be met throughout the project lifespan.

Based on concerns discussed above and missing or unclear information, we are assigning a rating of EC-2 (Environmental Concerns – Insufficient information) to this DEIS. A copy of the rating system used in conducting our review is enclosed for your reference.

We appreciate the opportunity to review this DEIS. If you have question about our comments, please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Theo Mbabaliye of my staff at (206) 553-6322 or electronic mail at mbabaliye.theogene@epa.gov.

Sincerely,

Christine B. Reichgott

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure

U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action*

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.