

July 22, 2010

Cascade Crossing Transmission Project
1515 SW 5th Ave, Suite 1022
Portland, OR 97201-5449

Gary L. Larsen
Mt. Hood National Forest
16400 Champion Way
Sandy, OR 97055

RE: Portland General Electric Cascade Crossing Transmission Project

Submitted by email to comments@cascadecrossingproject.com, signed copy submitted to above addresses

Dear Mr. Larsen:

Thank you for the opportunity to submit comments on the scoping letter regarding the proposed Cascade Crossing Transmission Project.

Since 1999, Bark has been actively working to protect and restore the ecosystems of Mt. Hood National Forest. Our mission is to bring about a transformation of Mt. Hood National Forest into a place where natural processes prevail, where wildlife thrives and where local communities have a social, cultural, and economic investment in its restoration and preservation. As of writing these comments, we represent over 5,000 Oregonians who support our mission.

We also wish to submit these comments on behalf of other organizations committed to the forest, waters, wildlife and recreation opportunities found in Mt. Hood and Willamette National Forests. Please consider Bark and Cascadia Wildlands as continuing resources for information and clarification on concerns for the impacts that the Cascade Crossing Transmission Project poses to our iconic national forests.

Bark's experience working with impacted landowners who have the misfortune of living along the proposed Palomar Pipeline route has given us profound appreciation for the disruption and irreversible impacts caused by the siting of an energy transmission corridor on private and tribal land. Even before construction directly effects the operation of a farm or the long-term profit of an orchard or tree stand, the process of eminent domain can take a drastic toll on working families as the process looms in an unknown future. Our comments are focused on the lands owned by all of us, our national forests. However, we commit to holding the agencies responsible for permitting on private land segments to the highest standard of respect for those Oregonians who have made generational commitments to our region's economic vitality. We also expect a high level of effort to engage tribal governments and leaders, particularly the Confederated Tribes of Warm Springs to understand and assess their concerns.

The Cascade Crossing Transmission Project is a proposal by Portland General Electric. The proposed corridor would lead to:

- Construction of a 210-mile transmission line, in a corridor that would be 90% parallel to existing transmission lines and require a right of way that would be 150 to 250 feet wide;
- Construct permanent roads which would be used to access the line, towers and right of way;
- Construct three new substations;
- Expand two existing substations; and
- Construct communications system fiber optic signal regeneration stations.

The following comments, questions and concerns are in anticipation of a Draft Environmental Impact Statement (DEIS). These are a general brush of questions and concerns that have arisen from this public comment period but are in no way exhaustive of all our concerns. Given the scope of impacts and broad footprint of the project we expect an ample (90 days or more) public comment period following the release of the DEIS, in order for more substantive comments to be submitted.

Maps

The scoping maps provided to the public are unacceptable. This 210-mile corridor is simply too large for meaningful information to be conveyed in one map. We cannot see where the corridor veers off of the existing corridor, thus being unable to know the exact location for the corridor. The alternatives are proposing new corridors, as well. These cannot be identified by the existing strip of clearcut on satellite photo or map of the area, such as is the case with the proposed corridor. The result is that scoping comments from interested parties cannot be substantive. **We request quadrant maps that allow for Township, Section and Range identification before the release of the Draft Environmental Impact Statement, in order to go out to sections of the proposal and begin to have a true understanding of what the project looks like from the ground level.**

We highly encourage the use of Google Earth or other free, interactive software for communicating with the public about projects of this scope and complexity. The US Department of Energy has been promoting the [Interwest Energy Alliance Project Locator tool](#) as a way to keep updated on proposals. If the lead agency (Forest Service) cannot coordinate use of these tools, we expect the Forest Service to work with one of its many advocacy partners to maintain a similar mapping feature.

“Palomar” Alternative

Under the National Environmental Policy Act (NEPA), every proposed action must have a range of alternatives to include in the analysis. The proposed Cascade Crossing includes several alternative routes, one of which proposes to use a section of the corridor that would be created for use by the Palomar Pipeline. This corridor was also originally designated under the Westwide Energy Corridor as number 230-248.

It has been over three years since Bark and other environmental groups joined with dozens of citizen groups on the coast and along the pipeline routes, fighting to stop the expansion of Liquefied Natural Gas (LNG) into and through Oregon. The proposed Palomar Pipeline is a 217-mile pipeline that would connect LNG development at the mouth of the Columbia River to existing pipeline infrastructure in eastern Oregon. Approximately 47 miles of the pipeline crosses Mt. Hood National Forest. It passes through logging projects that were cancelled due to environmental concerns. It will need the logging roads that Congress has allocated funds to properly remove after decades of degrading integral watersheds. It crosses over trails we go to when we need inspiration and reminder of our infancy in the natural world, including the Pacific Crest National Scenic Trail. And it will cross streams, creeks and rivers, systems we depend on for our drinking water. More than one-third of all Oregonian's drinking water originates from the slopes of Mt. Hood. This is where Bark draws the line; no one should ever have to be asked to risk their access to clean drinking water for corporate profit.

In a letter dated December 18, 2008, Senator Ron Wyden (OR-D) submitted strong concerns to the Forest Service. "In summary, I want to express my deep opposition to the Forest Service's proposal to amend the forest plan which fails to recognize the potential for lasting damage to rivers and streams, as well as to the valuable forest ecosystems that will be bisected by the freeway-wide clear-cut necessitated by this project."

In July of 2009, Bark joined as a plaintiff on a lawsuit challenging the Westwide Energy Corridors Programmatic EIS (WVEC). We hope to correct a process that has good planning intention and poor implementation. The result of the WVEC was to allow for corridors such as the Palomar Pipeline to be included despite the myriad of land designations and reserve-system protections that had been placed on areas that it would pass through.

The guidance in WVEC does not require agencies to utilize corridors chosen through the Westwide Energy Corridor process. Additionally, the proposal already has alternative routes that follow another existing transmission corridor and is a more acceptable alternative route to be comparing with the proposed route. **The alternative corridor proposed in the Cascade Crossing project that includes use of the "Palomar" corridor (Route 230-248), should be immediately removed from consideration and not analyzed under the range of alternatives.**

No Action Alternative

We expect that a part of the range of alternatives analyzed in the forthcoming Draft Environmental Impact Statement will also include a "No Action" alternative. Should the agency decide to expand its analysis of a No Action alternative beyond the direct environmental impacts of not implementing the project, we expect the agency to implement a good faith effort to assess the true benefits and impacts of this project. Should there be an analysis of a needs assessment, we expect there be a more robust inquiry into the public interest of this project based not on the industry speculation, but on independently found data and findings.

Similarly, we encourage the agency to balance any analysis of future technological advances in renewable energy sourcing that might justify this development for the public interest with analysis of the advances in conservation and “smart grid” opportunities to justify a No Action alternative.

Westwide Energy Corridors

Under the 2005 Energy Policy Act, Section 368 requires the Secretaries of Agriculture, Commerce, Defense, Energy and Interior, in consultation with the Federal Energy Regulatory Commission (FERC), other governments, industries, and other interested parties, to designate energy corridors on federal lands. The agencies are required to complete any environmental reviews and incorporate the corridors into existing land use plans as part of the designation process. Section 368 also requires that the agencies establish procedures to ensure that additional corridors are designated promptly and to expedite applications for construction of pipelines and facilities within the designated corridors.

Although controversial, the Westwide Energy Corridor planning process presents an important opportunity for future renewable energy planning. Current litigation, in which Bark is a plaintiff, is challenging many of the site-specific and procedural assumptions of this planning process. However, we understand that the need for long-term planning for the future of energy transmission is inevitable. Current environmental laws, regulations and land-use designations provide a starting point for identifying areas that are not acceptable for corridor expansion. Use of existing manmade right-of-ways (roads and energy corridors) should always be prioritized for initial potential.

The purpose of the Westwide Energy Corridor was to bring numerous federal land management agencies into alignment with regulation agencies for a regional analysis of priority corridors and the potential environmental effects of this new transmission system. Although we are currently questioning some of the corridors chosen for priority, we value the intention to formally designate corridors that have been looked at both from a larger regional energy source to consumer need, as well as the localized resource management and conservation priority.

The proposed route for the Cascade Crossing corridor does not fall into one of the proposed priority Westwide Energy Corridors. Why has Portland General Electric opted out of this planning process? Did PGE attempt to engage in the WWEC process to ensure that Cascade Crossing was considered in this larger planning effort? Has PGE consulted with any other regional planning body that has evaluated environmental impacts rather than just the future market predictions?

In a December 2009 meeting with PGE staff, we were informed that the “Palomar” alternative was not a viable option. The corridor, though proposed for designation that would allow for both pipeline and electrical transmission, is designed with pipeline needs prioritized and does not promote the ridgetop-to-ridgetop feature for a powerline corridor to have the least environmental impacts.

We understand that the Westwide Energy Corridor planning process may not have been desirable or provided good direction for PGE. However, we do not agree that transmission siting can happen in a vacuum. There must be a higher level of planning and strategic prioritization for renewable energy access. We strongly urge the agency to include in their analysis any national or regional guidance that PGE did use in siting the transmission corridor they are intending to build. If no other planning process, such as the Western Governor Association's Western Renewable Energy Zones report

Wind Power Expansion in Eastern Oregon

In the past decade, Oregon has become a major presence in the movement towards large-scale, industrial wind development. The interest to move energy transmission away from the regionally powerful Bonneville Power Administration (BPA) has presented a cash-rich potential for energy sourcing companies to move into transmission services. The BPA, originally created to oversee the large expansion of hydropower on western rivers, still transmits most electrical power throughout the Northwest making enough from this service to fund the agency independently from its umbrella agency, US Department of Energy.

The BPA has provided transmission capacity for PGE's Biglow Canyon Wind Farm, which will have a carrying capacity of 450 megawatts upon completion. Does PGE plan to connect the Cascade Crossing transmission corridor to the Biglow Canyon Wind Farm or any other proposed wind farms? The scoping letter implies that the Cascade Crossing corridor will be facilitating power from expanding wind farms. The inclusion of connector lines from any existing or known electricity generation source must be included in the cumulative impacts analysis as a foreseeable future action, if not included into this analysis as a connected project entirely.

Additionally, BPA's Klondike III/Biglow Canyon Interconnection will provide transmission to the additional wind developments in Sherman County, Klondike and Orion Wind Projects. How does the competition of the Cascade Crossing transmission line impact these current development projects? Which wind projects does PGE actually anticipate facilitating? Which currently have the expectation of using BPA lines and which are in need of new capacity?

Invasive Plant and Vegetation Management

Some of our biggest concerns about the impacts from the proposed transmission corridor are in vegetation management; the strategies for ongoing invasive plant treatments and the expectation for hazard tree removal.

Transmission corridors present a significant challenge to the continuing efforts for invasive, nonnative plant removal and suppression. The sudden removal of canopy coverage, soil disturbance and extended presence of large construction equipment creates an ideal scenario for uncontrollable introduction of widespread invasive plants. Controlling this growth along existing transmission corridors has proven to be extremely expensive

and intensive on land managers. Questions and concerns that we have include, but may not be limited to:

- Where the transmission corridor is an expansion of an existing corridor, what management practices are currently being used? Has monitoring shown that they been effective?
- Which nonnative species will be specifically targeted or eradication in the many landscapes that the proposed transmission corridor goes through?
- Will Invasive Plant management be the whole responsibility of the land management agencies (Forest Service and Bureau of Land Management) or does the company continue to be apart of maintenance strategies? How does this division of work made clear and how is the efficacy monitored?
- Assuming regular visits are required for ongoing nonnative plant management, what necessary infrastructure will be included with the cumulative impacts analysis? Which roads will be needed on a recurring basis?

In addition to the management of nonnative species, we are also very concerned about the continuing justification of hazard tree removal. Several studies have shown that one of the biggest threats to reliability is the vegetation management around the transmission lines. We can assume PGE is pursuing the most narrow corridor possible in an effort to clearcut the least amount of forest. However, if the expectation is that PGE will perpetually fell trees that pose a risk to the powerlines than that needs to be incorporated into the analysis of impacts to the surrounding forests.

Amendments to Existing Land Use Designations

Recent experience with the expansion of pipeline infrastructure for the proposed liquefied natural gas terminals on the coast of Oregon has dropped many public lands advocates based in the Pacific Northwest into the new reality of transmission corridor expansion with an abrupt realization that the decades of conflict and resolution around old-growth protection and watershed health appears as a mere road bump in the eyes of energy speculators. Land use designations on our federal public land such as Late-Successional Reserves, Wild and Scenic River Corridors and specific National Forest designations are significant expectations that the public have for land managers to maintain and enhance the health of our forests.

If the proposed Cascade Crossing corridor would require amendments to management plans on the Mt. Hood or Willamette National Forest or any Bureau of Land Management holdings, this should have been revealed in the scoping letter sent to the public. We strongly advise the lead agency (Forest Service) to immediately reveal any anticipated changes, amendments or exemptions to the management plans on behalf of this project.

The Mt. Hood and Willamette Land and Resource Management Plans were both released in 1990, making their LRMPs nearly eleven years overdue for a revision. Neither of the LRMPs have sufficient guidance on the expansion of the energy transmission grid. We expect that all changes to the LRMP caused by the Cascade Crossing project will utilize guidance for

significant changes to an LRMP found in the National Forest Management Act and for BLM under the Federal Land and Policy Management Act.

Boardman Coal Plant

Portland General Electric (PGE) operates Oregon's only coal plant located in Boardman, Oregon. The Boardman Coal Plant emits 5 million tons of carbon dioxide, over 15,000 tons of sulfur dioxide and nitrogen oxide and over 200 pounds of mercury every single year making it Oregon's largest stationary source of global warming pollution.

PGE, which began operating the plant in 1980, has recently announced a plan to close down the plant by 2020. PGE has also acknowledged an interest in putting a gas-fired plant on the Boardman site to continue the site's place in the energy grid. We expect PGE to maintain transparency in the forthcoming Environmental Impact Statement and state-level Energy Facility Siting Council (EFSC) process. If PGE is planning to invest millions of dollars into a transmission line to Boardman, creating a redundant system to the existing transmission lines, we can assume that PGE is investing for the long-term. Any PGE plans for ongoing impacts from coal-powered plants, ignoring this public commitment to close the coal plant in 2020 or transitioning the site to other forms of energy production must be acknowledged and analyzed in a cumulative impacts assessment.

If the Cascade Crossing transmission line would ultimately be the supporting transmission for a gas-fired plant then all associated development must be recognized in the cumulative impacts analysis, including but not limited to new gas-fired facility, importing development such as existing or proposed pipelines, use of existing infrastructure such as railtracks, roads and other powerlines, and waste removal from the retirement of the coal-fired plant. The near-term future of Boardman as an energy producing site is directly related to the need and thus impacts from the Cascade Crossing transmission project.

Bonneville Power Administration

Currently, ratepayers receive the majority of their power transmitted over lines administered by the Bonneville Power Administration. The BPA is able to keep regional power costs low because they are not achieving profit from the sale and service of the power they are generating and transmitting. How will ratepayers be affected by PGE's attempt to move away from BPA's power grid? We expect a full disclosure of cost increases included in the economic and cultural analysis of the impacts to local communities as a result of this project.

Wild & Scenic Rivers

The proposed Cascade Crossing transmission corridor crosses three rivers at sections that currently have Wild and Scenic River Corridor status; Clackamas, Deschutes and John Day River. These are managed by various agencies for various outstandingly remarkable values and under various management classifications (i.e. wild, scenic, and recreational).

It was during a time of expansion and construction of hydroelectric and other energy development projects that the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§ 1271-

1278) was passed in order to “preserve other selected rivers or sections thereof in their free-flowing condition to protect the water quality of such rivers and to fulfill other vital national conservation purposes.” Since then, the WSR System has vastly grown to include some of the most spectacular rivers in the nation.

Section 10(a) of the Wild and Scenic Rivers Act provides general management direction as follows:

Each component of the national Wild and Scenic Rivers System shall be administered in such manner as to protect and enhance the values which caused it to be included in said system without, insofar as is consistent therewith, limiting other uses that do not substantially interfere with public uses and enjoyment of these values.

We expect the EIS to evaluate the anticipated impacts to each WSR’s outstandingly remarkable values.

In addition to designated WSRs, the land managing agencies also have certain duties in regard to WSRs that have been deemed eligible or suitable for designation. Interim protective management before designation should be discussed within the EIS although there are longstanding, specific guidelines for how it is to occur on behalf of the agencies.

The Forest Service Planning Handbook, 1909.12, provides the agency with the following guidelines for utility proposals within eligible and suitable WSRs:

a. Wild, Scenic, Recreational. New transmission lines such as gas lines, water lines, and so forth are discouraged. Where no reasonable alternative exists, additional or new facilities should be restricted to existing rights-of-way. Where new rights-of-way are indicated, the project shall be evaluated as to its effect on the river’s outstandingly remarkable values and classification. Any portion of a utility proposal that has the potential to affect the river’s free-flowing character shall be evaluated as a water resources project. § 81.51(5)(a).

The BLM Manual 8351 sets out policy and program direction for identification, evaluation, and management of Wild and Scenic Rivers. The Manual’s provisions for rights-of-ways provides the following language for wild, scenic and recreational river areas alike:

New transmission lines, natural gas lines, water lines, etc., are discouraged unless specifically authorized by other plans, orders or laws. Where no reasonable alternative location exists, additional or new facilities shall be restricted to existing rights-of-way. Where new rights-of-way are unavoidable, locations and construction techniques shall be selected to minimize adverse effects on [wild, scenic, or recreational] river area related values and fully evaluated during the site selection processes. See, BLM Manual 8351.5(A)(2)(i); 8351.5(B)(2)(i); 8351.5(C)(2)(i).

We acknowledge that the corridor being proposed would follow adjacent to existing transmission corridors. The impacts to the wild, scenic or recreational qualities of the river

may not be as much as a new corridor; however we expect a high level of analysis to be included in the EIS, where it pertains to WSR designation.

Environmental Impacts

Development of large-scale transmission facilities will have significant impacts on the lands upon which they are located. These impacts include direct impacts from road construction, siting of tower pads and support infrastructure, and potential for bird and bat collisions with towers and wires; as well as indirect impacts such as habitat fragmentation, increased predation from perching raptors, and viewshed impacts. An inappropriately sited and constructed transmission line has the potential to cause significant damage to the environment and to human health. Accordingly, it is crucial that the agency commit to avoiding sensitive areas, obtain necessary information on lands with wilderness characteristics and consider maximizing use of existing development corridors in siting transmission lines.

Some of the greatest potential environmental impacts from transmission infrastructure are to bird and bat species through migratory, nesting and roosting interruptions. Many bird species are already facing new adversity from the recent expansion of wind development in central Oregon. We expect a rigorous and thorough study of the impacts to bird species caused by the proposed Cascade Crossing corridor.

Certain places are not appropriate for large-scale transmission lines and certain categories of lands should be avoided. Based on their important natural values and potential for damage from the construction, use and maintenance of transmission lines, we recommend that the Draft EIS include a commitment to not siting new corridor routes proposed and alternative routes in the following areas on Forest Service and BLM lands:

1. Wilderness Areas;
2. Wilderness Study Areas (WSAs);
3. National Monuments;
4. National Conservation Areas;
5. Other lands within BLM's National Landscape Conservation System (NLCS), such as Outstanding Natural Areas;
6. National Historic and National Scenic Trails;
7. National Wild, Scenic, and Recreational Rivers, study rivers and segments, and eligible rivers and segments;
8. Areas of Critical Environmental Concern (ACECs);
9. Special Recreation Management Areas;
10. Threatened, endangered and sensitive species habitat, as well as critical cores and linkages for wildlife habitat;
11. Citizen-proposed wilderness areas;
12. Other lands with wilderness characteristics; and
13. Late-successional Reserves under the NW Forest Plan.

This category should also include lands that are included in pending legislation for designation in one of the above categories or would otherwise include provisions that prohibit siting of large-scale transmission lines.

In addition to avoiding ecologically-sensitive lands, we recommend that already impaired lands continue to be considered priority. Existing ROWs, degraded agricultural lands, and other already impacted areas provide opportunities for siting transmission lines without loss of other uses and values. Such sites are often close to existing infrastructure, which provides additional benefits. Proximity to existing infrastructure will minimize new road construction or major roadway improvements (such as paving and widening), avoiding another set of impacts on the public lands.

SITE-SPECIFIC CONCERNS:

Breitenbush Hot Springs – The history of the Breitenbush Hot Springs and Spa is both long and rich with resistance to development in the area. The community that runs this cultural icon has been a powerful steward to the lands that they occupy. The community is within a mile of the existing corridor and would be undoubtedly impacted by the expansion of this visual scar on the land. We expect the agency and PGE to maintain engagement with them as an important stakeholder in this project's future.

Olallie Scenic Area – The section of the proposed corridor route that goes through Mt. Hood National Forest travels just north of the Olallie Scenic Area. This is a very popular destination for recreationists in the region because of the Cascade transition promoting rich ecological diversity and geological formations supporting over 200 lakes. How will this impact the high quality recreation opportunity that currently exists? Are any of the campgrounds within the range of noise created from the surge in the powerlines? Because people are often staying for several days in the dispersed campsites along Road 4220, including the Olallie Meadows Campground, are there health concerns for people who have prolonged exposure to these high-tensioned powerlines?

Thank you for taking the time to consider our comments. Please keep Bark and Cascadia Wildlands updated throughout the review process.

Sincerely,

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