



**EFSEC**

**Washington State  
Energy Facility  
Site Evaluation  
Council**



## **WALLULA POWER PROJECT SCOPING REPORT**

### **Proposed Project**

On August 20, 2001, Wallula Generation, LLC, submitted an application to the Washington State Energy Facility Site Evaluation Council (EFSEC) to construct and operate the Wallula Power Project, a 1,300-megawatt natural gas-fired combustion turbine electrical generation facility. Associated with the proposed generation facility will be approximately 34 miles of new electrical transmission lines (Wallula-McNary Transmission System Project) and a 5.9-mile natural gas pipeline. The proposed Wallula Power Project will be located within Walla Walla County, near the community of Wallula.

### **Environmental Analysis**

EFSEC has taken lead agency status under WAC 173-11-938 [State Environmental Policy Act (SEPA) Rules] for the environmental review of Wallula Generation, LLC's proposed generation facility. The Bonneville Power Administration (BPA) is the lead agency for the transmission lines, access roads, and substations under federal jurisdiction, proposed to connect generated power to the Federal Columbia River Transmission System. The Federal Energy Regulatory Commission (FERC) is responsible for siting of the natural gas pipeline, also under federal jurisdiction. EFSEC and BPA will be preparing a joint environmental impact statement (EIS) for this project.

### **Public Comments/Scoping**

When siting a new energy facility, EFSEC is required to hold a public information meeting in the county in which a project is located. To meet this requirement, EFSEC and BPA co-hosted both an agency and a public EIS scoping meeting on October 2, 2001. The agency meeting was held at 1:00 pm at the Columbia River Basin Community College in Pasco, WA. The public scoping meeting was held that evening from 6:30 to 8:30 p.m. at Columbia Middle School in Burbank, WA. At both meetings, Wallula Generation, LLC presented a description of the project, reasons why the proposed site or location was selected, and a short summary of anticipated environmental, social, and economic impacts. EFSEC staff then described the state's siting process, followed by a short presentation by the Counsel for the Environment, a Washington State Assistant Attorney General who represents the citizens of Washington State before EFSEC. In addition, BPA staff explained the federal review process for the transmission line.

Agency and public comments were recorded during this and previous meetings and are compiled in this summary report along with written comments submitted by comment form, e-mail, fax, and letter. Comments are grouped by general topic (and repeated, in some cases, if they relate to more than one issue). Approximately 40 people attended the agency meeting and about 80 people attended the evening public scoping meeting on October 2.

### *Air Quality*

- Evaluate this projects contribution to existing levels of air pollutants. Air quality impacted by power facilities: 12 Walla Walla, 8 Umatilla Basin, agriculture and other industry, (gas-fired facilities from BC to CA).
- Criteria pollutants, CO<sub>2</sub> and water vapor, Walla Walla temperature inversions and water (combustion and evaporation). Quantity of water from all sources in region. Importance of fog (impacts with inversions). Fog a problem for Highway 1 and 12; icing and PM<sub>10</sub> impacts on smog.
- Odor impact with southwest winds in Walla Walla.
- Back-up diesel for energy generator (emissions)/ impacts/ time used.
- Quantify proposed PM<sub>10</sub> and PM<sub>2.5</sub> emissions from this facility (area reclassification to “moderate to serious” non-attainment).
- Identify and describe other control options and measures to achieve greater PM<sub>10</sub> and PM<sub>2.5</sub> emission reduction.
- Describe and explain mitigation for PM<sub>10</sub> and PM<sub>2.5</sub> particulate.
- Explain PM<sub>10</sub> proposal offsets and show estimation of the PM<sub>10</sub> generated by the proposed offsets.
- Describe the Lowest Achievable Emission Rates (LAER) air permitting process the plant is subject to for particulate and how the plant will meet requirements.
- How will BACT be applied for other criteria pollutants?
- Describe and quantify effectiveness of proposed emission controls.
- Impacts of and mitigation for vapor plume especially during winter inversions at freezing temperatures
- Identify potential Toxic Air Pollutants (TAPS) of concern. Control strategy?
- Describe potential to emit VOCs from this facility’s operation.
- Non-attainment status and PM<sub>10</sub> emissions. Location of existing PM matter (monitor). Requirement for on-site monitoring. Boise Cascade monitors.
- Mitigation for CO<sub>2</sub> emissions. (e.g. Oregon? Sumas? Chehalis? funding?)
- Mitigate all emissions (NO<sub>x</sub>, CO, SO<sub>x</sub>).
- Impacts to immediate vicinity (1 mile), climate effects on buds on trees (orchard).

### *Water Resources/Water Quality*

- Impacts of large quantities of water drawn from the wells for the project.
- Hydrological levels compatible with continuity of the Columbia River?
- Stormwater directed to infiltration basin?

- Columbia River recharge groundwater? At gravel bars (shallow Pasco gravel bar)?
- Describe aquifers, depths and characteristics. Where is water coming from? Impacts to groundwater. Physical supply/source (hydrology as a whole), water rights, aquifer/ river continuity/ impacts.
- Verify water rights.
- Air verses water-cooling (water vapor/ water usage). If available reference Electric Power Research Institute's analysis for California. Compare/contrast this information with economic analysis in ASC.
- Provide analysis for potential to drawdown the deep aquifer (Port of Walla Walla property).
- Greater conservation and reuse of water possible beyond that proposed?
- Impacts of removing agricultural practices.
- Approximate flows for each waste category?
- Evaluate alternatives for evaporation pond liners (geosynthetic and clay).
- Describe leachate detection and collection system for detection and containment of leaks in top liner of evaporation ponds.
- Describe response action plan if significant leak occurred in evaporation pond top liner.
- Chemically characterize wastewater effluent from plant (compounds and concentration levels).
- Describe waste designation process and alternatives for waste management for sludge/salt cake (evaporation ponds) removal and disposal.
- Impacts of groundwater withdrawals to Columbia River temperature (pumping aquifers reduces stream flows to Columbia River).
- Describe secondary containment for fuel tanks.
- Plan for sanitary wastewater disposal during construction.
- Monitoring of groundwater.
- Impacts of access roads for transmission lines to surface water.

#### ***Wildlife and Wetlands/Vegetation***

- Describe the wetlands on site, their classification and how wetland impacts would be avoided.
- Include a reference to and describe the relationship of this project to the Shoreline Management Act in wetlands discussion.
- Present wetland/ wildlife mitigation plans.
- Follow Fish and Wildlife recommendations (12).
- Impacts to larger birds/ pelicans, migratory waterfowl and raptors from site structures (stack heights), evaporation ponds. Include bird mortality from collisions.
- Analyze the environmental impacts to McNary Wildlife Refuge.
- Transmission line road impacts, soil compaction and erosion on local waterways (migratory birds).
- Transmission line towers and lights - impacts on migratory birds.
- Monitor leakage of evaporation ponds.

- Evaluate route alternatives to minimize impacts (e.g. fragmentation from transmission line construction) to shrub-steppe ecosystem.
- National Wildlife Refuge. Site structures (stack heights) and bird mortality impacts (avian collisions).
- Parallel site - McNary Refuge - birds, feed on fields - impact and health hazards.
- Transmission line towers and lights - impacts on migratory birds.
- Effects of evaporation ponds on migratory birds.
- Address EMF at the McNary Refuge and affects on wildlife.
- Impacts to immediate vicinity (1 mile) and climate (temperature, humidity) conditions. Effects on orchards (buds).
- Cumulative increased risk of bird strikes with so many new transmission lines proposed.
- Increased risk of bird electrocution.
- Increased risk of introduction and spread of noxious weeds in transmission line and access road ROW.
- Loss of wildlife habitat due to vegetation clearing in the transmission line ROW.
- Can the transmission line be buried under the Walla Walla River crossing?
- Avoid wetlands with transmission tower sites.
- Replace destroyed sagebrush, antelope bitterbrush, rabbit brush, and grasses with same species where disturbed in transmission line ROW within Pheasants Forever Wildlife Habitat Project.
- Place brush debris in piles within Pheasants Forever Wildlife Habitat Project.
- Florida Power and Light conducted migration studies of birds for the Stateline power project.
- The Confederated Tribes of the Umatilla did some wildlife surveys in the area 3-4 years ago.
- Blue Mountain Audubon Society in Walla Walla is knowledgeable about the birds in the area.

### ***Energy and Natural Resources***

- Discuss "need" for the facility and provide information or justification relative to supply/demand for power at local/state level for both current and projected power needs.
- Availability of natural gas and efficiency of usage (heat verses electricity).
- Need for additional pipeline capacity?
- Is additional transmission line needed?
- How will use of natural gas affect natural gas prices for consumers?
- New transmission line is necessary for the future of the Pacific Northwest.
- Are you sending the power to California?
- Option 2 into McNary substation is preferred.
- Is McNary substation near capacity?

***Land Use***

- Impact of zoning change on other development and resale value of property.
- Consider alternative route for transmission line to avoid my property.
- Use of access roads to transmission lines and BPA's right to use.
- Impact of transmission lines on agricultural use.
- Please avoid putting the transmission line across Frontier Ranchetts, which is west of Badger Canyon Road with 15 5-acre plated tracts with protective covenants, plus 100 acres south of the Frontier Ranchett. It has been perked and has a preliminary plat ready for development, which could be ready to go on the market.
- Have waterlines, control lines, and utility lines on property - and neighbors property - crossing proposed transmission line. Underground location services do not have this information.
- Have waterlines crossing proposed transmission line on DNR (Department of Natural Resources) property.
- Will negotiate for access road through property.
- Suggest relocating proposed substation 400 feet south.
- Would like new line to stay away from 395. Important for commercial development.
- Is Calpine affected?
- How much more right-of-way is needed for the new transmission line?
- Does this project lower the value of the land? Long term value?
- How much additional right-of-way is needed?
- I want to build a house on my property. Will this new line affect this?
- Option 2 into McNary substation may affect the way I can subdivide property.
- Concerned about changing the existing easement because it might change value of the property and keep us from building.
- Don't want people driving on asphalt driveway.
- Concerned about impact on property value 30 years from now.
- Project is located within urban growth boundary for Umatilla.

***Visual Resources/Light and Glare***

- Analyze the visual, aesthetic and functional impacts to and mitigation for McNary National Wildlife Refuge.
- Visual impacts of new transmission line, particularly in natural appearing area west of Hwy. 207.
- Concerned about the number of power lines coming through Umatilla. Visual impact.

***Socioeconomics/Public Utilities***

- Address local power sales.
- AES (Pacific) - 3% of total pre-tax income – mitigate local social issues. Wallula plant should match this

- Operation as merchant plant - benefits to Washington citizens.
- Address "environmental justice".
- Eastern Washington ("Energy Colony") vs. Western Washington power production. Are there alternative locations? More energy is produced than used locally.
- Construction and operation impacts on social services - displacement of local craftspeople (construction trades) by outside workers. [Example: Co-gen, Hermiston (Oregon), \$19 million tax break from public - to hire within 60 mile radius, instead, brought in workers from out-of-area. Hurts local economy and does not contribute tax to community.]
- Impacts on schools by imported workers who do not contribute to tax base.
- Benefits to lifestyle verses cost of environmental impacts - engines - worst polluters - other emissions, sources (cars), impact on Wallula water and energy efficiency - impacts of transportation.
- 5% of average income to taxes, same commitment as Applicant, more income back to community.
- Number of jobs, efficiency of generation, clean power, available power, cost of power, dollars invested.
- Additional economic development concerns to Walla Walla County - benefit to county.
- Plants need to be built with qualified union craftspeople - journeymen with the latest technical training, safe project with plus for contractors - partnerships with labor. Quality of construction with fair wages and support to community.
- Funding of social services, programs (i.e. youth programs) in immediate area.
- Balance environmental with socio-economic impacts.
- Who pays for the transmission line and will BPA commit to buy power?
- How will transmission lines affect the value of my property?
- Avoid irrigated croplands with transmission lines.

### ***Traffic and Transportation***

- Transportation, timing of other projects? Improvements for Dodd Rd, Highway 12 to 4-lane in 2003 - 4.
- Walla Walla City- transport-circulation/ individual UGA
- Walla Walla airport verses tri-cities – impact of fog on winter flight availability
- Transportation - increase in traffic; timing (work shifts), type, magnitude.
- Increased traffic impacts on emergency response time in area.
- Impact of increased fog on highway safety
- Hwy 12 is a Class 1 Access Managed highway. Transmission line crossing requires a permit from State of Washington and coordination with the state on access from Hwy 12.

### ***Health and Safety***

- Evaluate storage/ handling hazard materials on site - spill prevention.
- Security/ prevention of events (ex. Natural gas explosions)

- Air and water emissions – health hazards.
- Parallel site - McNary Refuge - birds, feed on fields - impact and health hazards.
- Financial liabilities, pollution, spills, health hazards and environmental mitigation.
- Noise. Start-up/ shutdown - abatement? Mitigation for impact on neighbors.
- EMF and high voltage.
- Impacts on emergency response in area.
- Protecting quality of life within high power production area.
- Stagnant winter air conditions (temperature inversions), cumulative with pesticides, herbicides, and other toxic agents (cancers).
- Separate analysis of threats to human health and animal health.
- Additional transmission lines will increase risk of aviation accidents, particularly wildlife biologists who conduct aerial surveys.
- Concern about liability of landowner where transmission lines cross property.
- Concern about fire starts during construction of transmission line.
- Impacts to cattle of the transmission lines, particularly at the feedlot.
- I can hear the existing transmission line now (noise)

### ***Cumulative Impacts***

- Cumulative air analysis of existing pollutants combined with those contributed by this project.
- Describe potential cumulative impacts of emissions (CO, CO<sub>2</sub>, NO<sub>x</sub>, PM<sub>10</sub>, O<sub>3</sub>) to air quality from many proposed gas-fired turbine facilities in the region [Franklin County, Walla Walla County, and Hermiston, Oregon area]. Interaction - (globally - air, water) of pollutant emissions (all media) with existing sources in area.
- Stagnant winter air conditions and cumulative impact to health from trapped emissions in air inversions.
- Impacts of existing power plants (Hermiston, Oregon) on agriculture, plants, and waterways.
- Cumulative visual impacts of all the proposed transmission lines.
- Analyze the future potential transmission needs from all the proposed power projects in the vicinity, including the Wanapa project.

### ***Cultural Resources***

- Impact to cultural resources of all the proposed transmission lines.
- Identification of traditional cultural properties.

### ***Project Facilities/Micellaneous***

- What assets in Wallula Generation LLC (a subsidiary to Newport) to protect the public: LLC shields Newport from financial liability. How will the public/local community be compensated/protected? Put up more secured funds (LLC has

- \$140 million at risk) lenders - permits/contracts in place. Will offering mitigation - enhancements. Public has 20% - LLC's equity.
- Evaluate impact of burying gas pipeline only 5 feet deep.
  - Project timeline for permits and approvals.
  - Who is financially (independent? funded?) responsible for monitoring (what? everything?)?
  - LLC - liability for site restoration.
  - Length of operation and effects of termination/ site restoration.
  - Facilities life – termination and site restoration.
  - Build window – set time line (i.e. 4 years) to operation after certification so project does not get shelved.
  - Newport Northwest (LLC) track record and qualifications.

### **How We Use the Comments**

All the comments received will help shape the analysis in the EIS. The comments help identify the key issues to be addressed in the EIS, as well as the impacts of most concern. Everyone who attended the meetings was given the opportunity to be added to the project mailing list.

### **Project Schedule and Next Steps**

- We are progressing according to schedule and plan to have a Draft EIS ready for review in February 2002 (pending the timely receipt of environmental reports from the applicant on the transmission line and pipeline). If you have any questions about the proposal, please call me at (360) 956-2047, or send me an email at [irina@ep.cted.wa.gov](mailto:irina@ep.cted.wa.gov). Thank you for your interest in our work.

Sincerely,

*/s/ Irina Makarow*

*/s/ Donald L. Rose*

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Enclosures: Written Scoping Comments  
Agency Meeting Attendants