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State of Washington
Energy Facility Site Evaluation Council (EFSEC)
P.O. Box 43172
Olympia, WA 98503-3172

Submitted via online portal at https://comments.efsec.wa.gov/

RE: Draft Programmatic Environmental Impact Statement for Electrical Transmission Facilities with a Nominal Voltage of 230 Kilovolts (kV) or Greater

Dear EFSEC,

Please accept these comments on behalf of Columbia Riverkeeper regarding the Draft Programmatic Environmental Impact Statement for Electrical Transmission Facilities with a Nominal Voltage of 230 Kilovolts (kV) or Greater (Draft PEIS). Columbia Riverkeeper's mission is to protect and restore the Columbia River and all life associated with it, from its headwaters to the Pacific Ocean. We are committed to clean water, strong salmon runs, and healthy communities. Columbia Riverkeeper represents roughly 16,000 members and supporters in Oregon and Washington and regularly engages in decisions and policies impacting the water quality of the Columbia River Basin. As an organization committed to environmental justice, Columbia Riverkeeper aims to ensure that, as energy projects are developed, Tribal governments' rights are honored and the Columbia River's iconic salmon will not suffer further degradation. Columbia Riverkeeper supports the comments submitted by the Columbia River Inter-Tribal Fish Commission (CRITFC) and incorporates them by reference.

Below are general comments focused on the Draft PEIS's application to one project covered under its scope: Cascade Renewable Transmission project (Cable Under the Columbia or Cable project). Due to the short timeframe to review this robust and complex document, comments are organized in high-level bullet points by section. This is the only project of its kind covered under the PEIS, and its grouping with other "underground transmission facilities" raises numerous concerns over an accurate impacts analysis. As discussed below, these comments strongly urge EFSEC to reconsider including the Cable project within the scope of the Final EIS. If, however, EFSEC decides to keep the Cable project under the scope of this PEIS, then the comments below demonstrate why a robust and thorough supplemental EIS (SEIS) for the Cable project is warranted.

Executive Summary

- This Draft PEIS explicitly does not apply to undersea and oceanic transmission.[1] Footnote 5 in the Executive summary states that, "the environmental impacts and technical considerations of sea cables can be significantly different from those of land-based transmission facilities. These differences might necessitate a distinct, focused EIS to adequately address the unique challenges and impacts." This reasoning applies with equal force to the Cable project. While the Cable Under the Columbia project is not an undersea or oceanic cable, it involves transmission lines *in* a body of water and is not simply a "land-based transmission facility" like other projects encompassed in this PEIS. While the Cable would be buried in the Columbia River's sediment and laid over portions of bedrock where in-sediment work is impossible, its impacts in the aquatic environment make it more analogous to undersea and oceanic cables. Considering this project as an "underground transmission facility" is arbitrary and not appropriate.
- If EFSEC continues to qualify the Cable Under the Columbia project as an underground transmission facility subject to this PEIS, then Columbia Riverkeeper strongly urges EFSEC to conduct a robust, project-specific SEIS to more accurately determine the impacts.

Chapter 2 - Transmission, Development Considerations, and Regulations

- For the Cable Under the Columbia project, a hydroplow will be used to liquidize Columbia River sediment, creating a trench to lay a cable from The Dalles to Portland. However, this method of underground cable "construction" is not explicitly mentioned in the Draft PEIS.[2] When discussing underwater crossings for transmission lines along rivers, the Draft PEIS only discusses the method of laying cables directly on the waterbed.[3] Other methods of construction mentioned are open trenching and numerous trenchless crossing options, including horizontal directional drilling, jack and bore, and tunneling.[4] How does the Cable project's unique construction method fit into any of these categories, and why is it not contemplated in this document?
- Section 2.3.4 discusses decommissioning plan requirements. For the Cable Under the Columbia project, a thorough, site-specific decommissioning plan, along with additional maintenance and repair plans, must be required. Specifically, with emphasis in this decommissioning plan on how the disturbed, 100-mile corridor of the Columbia River sediment will be fully restored, to ensure sensitive and culturally important aquatic species do not suffer.

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[1] Draft PEIS Executive Summary at ES-6.
[2] *See* Draft PEIS at 2-16–18.
[3] *Id.* at 2-17.
[4] *Id.* at 2-16–17.

- Further, the PEIS cannot make assumptions about site restoration and associated impacts if a project's developer actively contests the need for a decommissioning plan.

Chapter 3 - Affected Environment, Significant Impacts, and Mitigation

- In Section 3.2.3.2, regarding the upgrade and modification of underground transmission facilities, it should be noted that tiering to this analysis could be irrelevant for the Cable Under the Columbia project. This section states that "[w]hile adverse impacts would be similar to construction, adverse impacts from upgrading or modifying existing transmission facilities are generally anticipated to be lower than those for constructing new transmission facilities[.]"[5] However, for the Cable Under the Columbia, this statement could be inaccurate given the unique nature of this being underwater and in river sediment. Any upgrade or modification could re-disturb the riverbed, impacting fish and sediment-dwelling aquatic creatures similarly to the initial construction.
- The discussion and analysis of Water Quality Impacts of projects under the Draft PEIS[6] underscores the need for a SEIS for the Cable Under the Columbia project with all of its unknowns.
- Heat impacts on water quality are not something that is considered in the Draft PEIS sections on underground transmission facilities operation and maintenance.[7] Any heat generated by cables in the sediment and the riverbed may dissipate into the river itself. This should be addressed in the Final PEIS.
- The Water Quality Summary of Impacts, Mitigation Measures, and Significance Rating for Water Resources (Table 3.4-6) stating that the water quality impacts for all stages of the projects will have a "less than significant impact" is overly conclusive and too varied to be applied to a project as unique and precedent-setting as the Cable Under the Columbia line. This again reinforces the need for this project having its own EIS, separate from the PEIS or a thorough SEIS.
- Regarding Section 3.6.3.2 - Action Alternative for underground transmission facilities and its impacts on fish and special status species (for all phases of a project–construction, operation, maintenance, modification/upgrading, and decommissioning):
    - The statement that "[t]renchless construction has little to no impact on rivers, lakes, or streams as the construction occurs under the water feature"[8] is overly conclusive and unsupported.
    - Today, Columbia River salmon populations are a fraction of their historic size, and many populations are close to extinction. They face numerous threats along the Columbia, including habitat degradation and threats from increased water

[5] Draft PEIS at 3-49.
[6] *Id.* at pages 3-116–20.
[7] *See id.* at 3-118.
[8] *Id.* at 3-298.

temperatures. Direct habitat loss for fish, benthic species, and special status species is a huge concern for the Cable Under the Columbia project and warrants a SEIS.

- Regarding indirect habitat loss, Columbia Riverkeeper has concerns about sediment released during the construction of the Cable Under the Columbia project. Specifically, sediment near the Bradford Island Superfund site located at Bonneville Dam. Potentially hazardous and toxic pollutants in the sediment could be released into the Columbia River leading up to the Dam. This concern is unique to the Cable Under the Columbia project and warrants a thorough impacts assessment in a SEIS.
- Fish mortality and barriers to movement are other significant concerns around the Cable project. Adverse impacts of particular concern are electromagnetic fields (EMF), heat, and direct physical injury or death.

Chapter 4 - Cumulative Impacts

- In Chapter 4, Section 4.3.4.13 - Cultural and Historic Resources, the Cable Under the Columbia project is <u>not</u> one of the projects mentioned in this section as a covered project that "could impact historic and cultural resources."[9] This is a huge oversight, as this project could greatly impact Tribal resources and Tribal treaty rights. While we will leave the specifics of these concerns to the Tribal experts, Columbia Riverkeeper highlights this oversight and strongly urges EFSEC to do the required consultation with Tribal Nations on this matter, specifically as it pertains to the Cable project.
- Section 4.3.4.15 - Socioeconomics does not list the Cable Under the Columbia project as a project that could have adverse socioeconomic impacts, even though it could have negative environmental justice (EJ) impacts (including but not limited to impacts on Tribes and other subsistence fishing communities). Instead, it is labeled as a project that will only have beneficial cumulative impacts on socioeconomics and EJ.[10] This is overly conclusive and does not accurately assess the full impacts of this project.
- Section 4.4 Summary of Findings (Table 4.4-1):
  - Regarding the finding of "no" probable significant cumulative impact analysis for water resources, how did EFSEC come to this conclusion, given the possible impacts of projects like the Cable Under the Columbia?
    - There are numerous water quality concerns with that project alone, including heat pollution from a cable bundle being buried shallowly in the sediment of the Columbia River.
  - The finding of "yes" probable significant cumulative impacts for habitat, wildlife, and fish points to the need for a SEIS for the Cable Under the Columbia project.

[9] Draft PEIS at 4-41–42.
[10] *Id.* at 4-43.

- As highlighted above, the findings of "yes" probable significant cumulative impacts for both "cultural and historic resources" and "socioeconomics and environmental justice" are accurate; however, the Cable project is not listed as a project being adversely affected under these categories, which is a significant oversight.

Conclusion

In summary, there are numerous concerns with including the Cable project in this PEIS as an "underground transmission facility" given its unique and precedent-setting nature. The Draft PEIS is overly conclusive and fails to adequately analyze the specific issues raised with the Cable Under the Columbia. Qualifying this project as an underground transmission line is extremely problematic, given the Cable project's in-river placement and similarity to undersea cables, which are outside the PEIS's scope. The Cable project does not belong in the Final PEIS, should be left out like other undersea and marine transmission projects, and given its own EIS.

If, however, EFSEC insists on including the Cable Under the Columbia within the scope of the Final PEIS as an "underground transmission facility," Columbia Riverkeeper request EFSEC to complete a robust SEIS for the Cable project to ensure that a more accurate impacts analysis is done to better protect environmental health, salmon recovery, and water quality.

Sincerely,

Teryn Yazdani
Staff Attorney