



Kittitas Valley Wind PP
DEIS Comment – State 1

STATE OF WASHINGTON
WASHINGTON STATE PARKS AND RECREATION COMMISSION
7150 Cleanwater Lane • P.O. Box 42650 • Olympia, Washington 98504-2650 • (360) 902-8500
Internet Address: <http://www.parks.wa.gov>
TDD (Telecommunications Device for the Deaf): (360) 664-3133

January 14, 2004

Energy Facility Site Evaluation Council
Attn: Allen Fiksdal
PO Box 43172
Olympia, WA 98504-3172

RECEIVED
JAN 20 2004
ENERGY FACILITY SITE
EVALUATION COUNCIL

Dear Mr. Fiksdal:

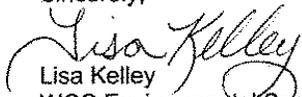
Thank you for the opportunity to comment on the Kittitas Valley Wind Power Project. While Washington State Parks and Recreation Commission (State Parks) certainly supports clean energy, there is concern this project may have substantial visual impacts to Iron Horse State Park's John Wayne Trail users. Wildlife viewing, especially recreational bird watching, will be impacted by the project from turbine noise disturbance, maintenance activities, and the reduction of habitat. (Kittitas Valley Wind Power Project 2003, pp. 32.2-42). Also, there could be significant mortality of birds, particularly passerines, accidentally flying into the turbines.

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As this process unfolds State Parks would like to be notified of comment periods, public meetings, and any other information regarding the Kittitas Valley Wind Power Project.

If you have any questions or concerns, feel free to call me at (360) 902-8631, or e-mail me at lisa.kelley@parks.wa.gov. Thank you for your time and consideration.

Sincerely,


Lisa Kelley
WCC Environmental Specialist

- cc: Iron Horse State Park (Kittitas access)
- Dave Jaquish, Maintenance and Preservation Manager, Eastern Region
- Mark Schulz, Environmental Specialist, Eastern Region
- Tom Ernsberger, Resource Stewardship, Eastern Region
- Larry Fairleigh, Assistant Director, Park Development Service Center
- Bill Koss, Statewide Planning Program
- Billie-Gwen Russell, Stewardship Service Center
- Deb Petersen, Environmental Specialist
- James Mitchell, Ginkgo/Wanapum Manager
- Central Files





01/20/2004 17:05 FAX 5095752474

WA DEPT FISH N WILDLIFE

002/006

Kittitas Valley Wind PP
DEIS Comment – State 2



State of Washington
Department of Fish and Wildlife
South Central Region – Ellensburg District Office, 201 North Pearl, Ellensburg, WA 98926
Phone: (509) 925-1013, Fax (509) 925-4702

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**ENERGY FACILITY SITE
EVALUATION COUNCIL**

January 20, 2004

Allen J. Fiksdal, Manager
Energy Facility Site Evaluation Council
P.O. Box 43172
Olympia, Washington 98504-3172

Subject: Kittitas Valley Wind Power Project – Comments on Draft EIS for proposed 182-Megawatt wind power generation facility in Kittitas County northwest of Ellensburg.

Dear Mr. Fiksdal:

Our comments below relate to the DEIS assessment of fish and wildlife, their associated habitats and the project's potential affects on these resources. Washington Department of Fish and Wildlife (WDFW) has been working with Sagebrush Power Partners, their consultants and the Energy Facility Site Evaluation Council (EFSEC) to review and provide comments and recommendations regarding this project since early in the application (Site Certification?) process. Concurrently, WDFW has worked also with representative of the wind power industry and proponents of renewable energy to craft state-wide guidelines for the protection of fish and wildlife resources when siting and operating wind power facilities. I have attached a copy of these guidelines for your information. (A copy can also be seen at http://www.nationalwind.org/workinggroups/wildlife/washington_windpower_guide.pdf)

We are generally satisfied with the information and review provided in the Draft EIS. The background studies and information collected on fish, wildlife and their habitats, are generally consistent with our earlier discussions with and recommendations to the proponents and their consultants. Moreover, with regard to fish and wildlife, the studies and mitigation measures in the DEIS are consistent with WDFW's statewide Wind Power Development guidelines. While there are elements in the DEIS that should be corrected and/or clarified in the Final EIS, they do not alter the overall analysis and conclusions.

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Chapter 3.2.5 of the DEIS identifies mitigation measures incorporated in the proposal to address project impacts and cumulative impacts. We concur with these mitigation measures and request that they be incorporated in the project license if the project is approved. This chapter also includes a subsection entitled "Additional Recommended Mitigation Measures" which we request be incorporated in the license if approved for this project.

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State Agency Letter 2

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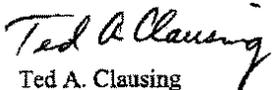
003/006

Name
Date
Page 2 of 3

We have a number of specific comments regarding the DEIS. These comments are attached.

Thank you for the opportunity to review the DEIS. If you have questions or need additional information, please contact Brent Renfrow of my staff at (509) 925-1013.

Sincerely,



Ted A. Clausing
Regional Habitat Program Manager

Cc: Chris Taylor, Zilkha
Lauri Vigue, WDFW
Brent Renfrow, WDFW

Attachment 1: WDFW Comments on DEIS
January 20, 2004
Page 1 of 3

**Washington Department of Fish and Wildlife Comments on
Draft EIS for Kittitas Valley Wind Power Project**

Shrub Steppe Plant Communities and Associated Wildlife – Impacts and Mitigation

- **Construction timing is an important mitigation measure:** Section 3.2.5 should include construction timing as a mitigation measure to avoid and minimize impacts to soils and vegetation. To the greatest extent possible, construction activities outside of the hardened footprint of the project (i.e. “temporary disturbance areas”) should be done during the late spring, summer and fall when soil moisture is very low.

For most of the project area, the time of year of construction will greatly influence the amount of long-term damage to soils and plants. The shrub steppe and grassland communities identified in the DEIS are very fragile when soils are wet. Even a single day of driving equipment on these sites when wet can result in substantial permanent damage. In contrast, during summer when soils are dry they can withstand traffic with minimal soil displacement and breakage of plant roots. Moreover, vegetation is more tolerant to damage during the dry period as the period of rapid growth has ended, many plants have completed flowering and setting of seed, and many are dormant.

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Working in winter on frozen ground is possible but because the project area varies greatly in elevation and is on generally south-facing slopes, predicting frozen ground conditions will be impractical for all but work of short duration.

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- **Post-Construction Restoration of Temporary Disturbed Areas - Standards for site restoration:** The DEIS should identify a reference standard (or a process to establish one) for evaluation of site restoration success. The standard could be based on a reference site selected within the project area for each vegetation type, the typical vegetation description for each soil type in the draft NRCS soil survey, or other agreed-upon standard. Post-construction restoration of temporarily disturbed areas should be sufficient to achieve site stability and agreed-upon similarity to the reference standard. Selection of reference standards should be done in consultation with WDFW and the Technical Advisory Committee.

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The DEIS (page 3.2-54) states reseeding would be done as soon as possible after construction is completed. We note, however, that seeding must be done at a time of year when germination and establishment can be successful. In practice it may be necessary to delay seeding while awaiting a favorable time of year. The DEIS

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Attachment 1: WDFW Comments on DEIS
January 20, 2004
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should specify that seeding will be done at the next suitable planting window, and that temporary erosion control measures will be implemented as appropriate.

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cont.

- **Proposed Acquisition of Habitat Mitigation Site and Clarification of proposed mitigation ratios:** The proposed habitat mitigation site is suitable, strategically located and should achieve the mitigation goals. WDFW requests that the recommended enhancement of the site noted in the DEIS (i.e. grazing management plan, weed control, and selective revegetation efforts.) be incorporated in the project in consultation with the TAC. The DEIS needs to be unequivocal as to whether these measures will be implemented.

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WDFW would calculate the mitigation needs and ratios presented in Table 3.2-13 slightly differently than the DEIS but this does not affect the adequacy of the proposal. As a point of clarification, the term "grassland" as used in the DEIS is a descriptive term for shrub steppe sites where the shrub canopy has been temporarily removed by fire or other temporal disturbance. Over time the shrub canopy will recover naturally. Technically these sites are shrub steppe (refer to Daubenmire, Steppe Vegetation of Washington, 1970) and the mitigation ratio associated with shrub steppe should be applied. In the context of the mitigation ratios negotiated with the wind power industry, a lower ratio was established for true grasslands (such as the Palouse) and CRP grass plantings because of the relative difference in restoration success and length of time to maturity. These grassland ratios should not be applied to the KVVPP site.

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- **Management of Big Game Animals, Hunting and Control Animal Damage on the project, including the acquired Habitat Mitigation Site:** In our scoping comments we noted that WDFW is liable for damages caused by deer and elk. There is potential for deer and elk to use project lands as a refuge from which to foray out to adjacent agricultural lands and cause damage to crops and irrigated pasture. The cost of big game damage can be a substantial burden. We requested that the project proponent not preclude public hunting as a means of dispersing animals or reducing herd size. We are pleased to note that hunting on private lands in the project will continue to be at the discretion of the landowner and not precluded by contract or agreement with the proponent (DEIS page 3.6-11, par.4). However, the issue needs clarification in the DEIS for DNR lands within the project and the acquired mitigation lands. WDFW requests that project clearly not preclude hunting on state lands, and that this be noted in the DEIS. In addition, as a mitigation measure WDFW requests that Sagebrush Power Partners LLC allow public hunting to control big game numbers on the project mitigation lands or otherwise control the big game population and use of those lands so as to prevent animal damage in a manner approved by the Technical Advisory Committee.

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Attachment 1: WDFW Comments on DEIS
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Wildlife - Direct Impacts and Mitigation

- **Meteorological Towers – Guyed Towers verses Free Standing:** The project proposes the installation of nine meteorological towers. These towers should be free standing towers which are demonstrably less likely to result in bird mortality. 13

It is well documented that towers with guy wires kill birds at a significantly greater rate than free standing towers. The DEIS notes that the typical avian mortality associated with modern wind turbines at comparable sites is about 2 birds per tower per year. In sharp contrast, the guyed meteorological towers at the analogous Foote Creek Rim wind project in Wyoming had a mortality rate of about 8 birds per tower per year. Thus, if unprotected guyed meteorological towers were used on this project instead of free-standing towers, annual avian mortality would be expected to increase by about 24%. The use of bird flight diverters has been proposed but there is no information provided as to the effectiveness of bird flight diverters in reducing avian tower strikes. Bird flight diverters have been used at many places in North America to deter large waterfowl from striking transmission lines near waterways. We have not been able to find documentation of successful use of bird flight diverters on tower guy wires to prevent avian collisions during either daylight or during night-time migrations. 14

The use of free-standing towers is a demonstrated mitigation technique for reducing avian mortality. Bird flight diverters should not be used in lieu of free-standing towers unless their effectiveness can be demonstrated or their use is part of an approved adaptive management effort coordinated with WDFW and other natural resource management agencies, and the Technical Advisory Committee. 15

- **Bald Eagles – Potential for Turbine Mortality and Contingency Plans:** The DEIS does not include contingency measures for addressing the potential of Bald Eagle mortality at the project. The DEIS provides a rationale as to why the risk to Bald Eagles is low but also concedes that some risk remains. The application for site certification includes a draft biological assessment with conservation measures for managing risk to Bald Eagles. These measures should also be included as mitigation measures in the DEIS. 16

- **Sharp-tailed and Sage Grouse Should Be Discussed in Section S.14.** Sharp-tailed grouse historically occurred in Kittitas County. Sage grouse occur in the county, though the population is a fraction of historic levels. The three proposals for wind generation facilities are sited in habitat that is suitable for one or the other of these species. Population recovery and reestablishing these two species in the state is an agency priority that may be affected by the cumulative effects of wind energy projects. 17



Christine O. Gregoire
ATTORNEY GENERAL OF WASHINGTON
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January 20, 2004

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**ENERGY FACILITY SITE
EVALUATION COUNCIL**

Allen Fiksdal, Manager
Energy Facility Site Evaluation Council
925 Plum Street S.E., Bldg 4
Olympia, WA 98504-3172

**Re: Kittitas Valley Wind Power Project (KVVPP) Draft Environmental Impact
Statement: Comments**

Dear Mr. Fiksdal:

Counsel for the Environment (CFE) appreciates this opportunity to comment on the Kittitas Valley Wind Power Project (KVVPP) Draft Environmental Impact Statement (DEIS). CFE takes no position in support or opposition of the KVVPP at this time. The following comments seek to ensure the Final Environmental Impact Statement provides the public with the most detailed information possible on the environmental impacts of the proposed wind power project.

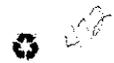
I. General Comments

The DEIS considers three wind turbine designs and focuses most of its attention on the middle scenario. While recognizing the need for flexibility in the purchase of wind towers, the difference in the three options makes it more difficult to fully evaluate the environmental impacts of the overall project. The ranges provide a generalized description of the impact; but, for example, a primary concern in this project is the visual impact. The size of the turbines selected greatly affects the visual impact. It would be much easier to evaluate the project if the Applicant committed to one option. The DEIS seems to indicate the middle scenario is the most likely construction option, since most of the estimates are based on this scenario. However, if the lower or higher option is selected more specific information on the impact of these options should be provided.

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Furthermore, without specifying a particular turbine design or manufacturer, it is difficult to evaluate the reliability of the turbines to be installed. For example, in 2-14, the Applicant is unable to specify the composition of the rotor blades or at what rpm the blades are expected to rotate. This information would impact safety concerns raised by many public participants regarding ice and blade throws.

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CFE also has concerns regarding the statement throughout the document that the Applicant proposes to return land to “as close as possible to its original condition.” *See e.g.* 2-23. For example, who determines what qualifies as “close as possible to original condition.” CFE would like to see a more specific measuring standard employed where these statements are made.

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II. Comments on the Summary Chapter

A. Purpose and Need for Project 1.2 (2-3)

This section addresses the projected demand for energy, but does not fully address the role of wind power in meeting the projected demand. Although there is discussion of utilities being required to offer alternative “green energy,” the section does not sufficiently demonstrate the demand for wind energy. Listing three companies with requests for proposal’s for wind power does not appear to constitute a “proliferation of requests from electric utilities to purchase wind power.” This section does not address how much capacity utilities are seeking or how much is currently produced in the state. The DEIS does not provide enough detailed information to assess the market for wind energy in Washington.

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B. No Action Alternative 1.4.3 (8-9)

The no action alternative does not fully explain why gas-fired combustion turbine is the most likely alternative to be built to meet increased demand if the KVVPP is not completed.

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C. Vegetation, Wetlands, Wildlife, and Fisheries 1.9.2 (14)

The DEIS states that the “[p]recise regional extent of lithosol habitat is not quantitatively known. Therefore, it is difficult to assess the specific magnitude of cumulative lithosol impacts at the three wind power project sites within the context of the surrounding region.” Lithosols are a WDFW priority habitat. Research regarding the impact of destroying lithosolic communities within the KVVPP on the overall quantity of lithosolic communities within the region should be conducted. Once lithosols are removed it is difficult, if not impossible to reestablish growth.

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III. Comments on Proposed Action and Alternatives Chapter

A. Decommissioning 2.2.6

The Applicant has indicated the life of the KVVPP is projected to be approximately 20 years, at which time either decommissioning or upgrading of equipment is possible. The Applicant acknowledges that such upgrades may require additional EFSEC review and approval in advance of repowering. CFE believes that if the project is approved by EFSEC, a review of the impacts by the KVVPP and a review of the environmental impacts of installing new equipment should be conducted before extending the time on the permit or allowing upgrading of equipment.

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The Applicant has indicated the foundations of the turbines would be removed to a depth of 3 feet below grade. The DEIS should address the impact of permanently leaving approximately 15-32 feet of cement after the first three feet below grade have been removed, depending on the process used. *See 2-24.* According to Table 2-6, a substantial amount of cement will be left behind following decommissioning under the current proposal. The DEIS should also address the effect of leaving the underground electrical collections system in place. These collection systems are also encased in cement according to the DEIS.

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Although this is an environmental impact statement, the possibility of future decommissioning procedures is dependent upon sufficient economic resources to meet all proposals. Therefore, the document should address the financial stability of Sagebrush LLC and its corporate structure in relation to Zilkah Renewable Energy Resources. The DEIS should contain a more detailed explanation of how Sagebrush intends to ensure sufficient funds are available to complete decommissioning procedures in the future than is provided in 3.1-16.

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B. Construction Costs 2.3 (32)

Since the DEIS discusses the cost of construction, it should also address projected tax credits associated with construction, in an effort to provide the public with a more accurate projection of the project's actual cost.

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IV. Comments on Affected Environment, Impacts, and Mitigation Measures Chapter

A. Avian Impacts and Mitigation 3.2

CFE is concerned about the DEIS's section regarding bald eagle presence in the KVVPP. The DEIS repeatedly states that no bald eagle has ever been killed at a wind project; yet, the DEIS acknowledges that bald eagles winter in the KVVPP and 33% of the bald eagles observed during the avian impact study were in the "kill zone." Rather than assuming no bald eagle will be killed, the DEIS should address what steps, if any, the Applicant intends to take if a bald eagle is killed. CFE has similar concerns regarding golden eagle mortality within the KVVPP.

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Additionally, the DEIS should address what steps, if any, the Applicant intends to take if avian mortality of raptors, passerines, or bats is higher than anticipated by the avian impact study. The study currently acknowledges that bird kills are projected to be higher than other wind power projects. Although the project outlines several mitigation steps, the DEIS does not address what mitigation steps will be taken if the study under estimates avian kills. The Applicant should address what steps it intends to take, if any, if the avian mortality rates exceed current expectations.

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B. Bats 3.2

CFE has concerns about the projected bat kills. Using estimates from other projects when no comprehensive study on bat mortality rates in wind projects have been conducted makes the current estimate unreliable. The Applicant should indicate what steps it intends to take, if any, if the bat mortality rate exceeds current expectations. Additionally, there is very

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little information included in the DEIS regarding the impact of bat deaths on the biological community.

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C. Technical Advisory Committee (TAC) 3.2-55

CFE agrees with the creation of the TAC team as a means of monitoring mitigation programs at the KVVWPP. However, the details of how decisions will be made, the powers of the TAC team, etc., should be outlined in greater detail. The proposal does not describe how many members the TAC team will have or how members will be selected. Most importantly, the proposal does not address what enforcement powers, if any, the TAC team will have if violations of the EFSEC permit are discovered or what the effect would be if the TAC team identifies serious adverse impacts of the KVVWPP once online. CFE believes the TAC commitment should be incorporated into the EFSEC permit and that a monitoring program in excess of three years may be advisable.

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D. Shrub steppe 3.2

1. Lithosols

The project's impact on the lithosols is of concern, because it is difficult if not impossible to restore disturbed lithosols. Looking at Figure 3.2.1, it can be seen that almost all lithosolic communities in the project area are disturbed by wind turbine placement. Lithosols are most common on ridge tops, which is also where the turbines are to be placed to maximize production. It should also be noted that ridge tops are the most common flight pattern spots for raptors, which places them at greater risk for collision. The DEIS does not fully address the necessity of placing the turbines on top of the ridges as opposed to moving them slightly off the ridge tops.

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Also, further evaluation of the condition of the lithosols in the project area should be conducted. The experts CFE has spoken with would characterize the lithosols as good to excellent as opposed to good to fair as described in 3.2-8 by the Applicant.

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While the 550 acres of mitigation habitat is commendable and exceeds the WDFW requirements, the mitigation area has minimal lithosols and the Applicant is proposing to permanently destroy between and 29 and 37 acres of lithosols. In fact, buried in a footnote in Tables 3.2-6 and 3.2-7 is an admission that the lithosol acreage disruption impact is probably underestimated by 10%. See 3.2-58. CFE agrees that if appropriate amounts of lithosol habitat is not identified at the mitigation parcel, additional lithosol habitat should be identified and acquired for preservation.

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2. Shrub steppe and vegetation in general

At 3.2-31, the DEIS states that use of heavy machinery may compact the soil, making it unsuitable for native plant growth and might reduce the infiltration of water and nutrients into

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the soil. The mitigation plan should take into account this possibility when reseeding and appropriate steps should be taken to ensure an effective reseeding program. The Applicant should monitor all reseeding projects for a period of time to ensure the reseeding process is taking root, taking necessary steps to ensure the reseeding process is successful. *See e.g.* 3.2-58.

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cont.

Finally, throughout the DEIS, reseeding programs are discussed. The DEIS fails to address the projected success of the reseeding process or how long it will take for the reseeding projects to reproduce the shrub steppe that is destroyed. The DEIS fails to provide examples of similar removal and reseeding projects, which would give the public a reasonable estimate of the actual effect of the removal of the shrub steppe. The DEIS should indicate how long it will take for the temporarily disturbed areas to return to current condition. The mitigation plan should also address what steps, if any, the Applicant intends to take if the reseeding program is not successful.

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E. Fire 3.13

The fire prevention plan should be addressed in greater detail. The DEIS never fully addresses whether the local fire departments have adequate equipment to facilitate rescues within the KVVWPP both during construction and during operation of the facility. The DEIS also does not fully address if the local fire departments have adequate resources to fight a fire that might be ignited during construction or once the facility is operational. A more detailed statement of the local fire district's relationship with the KVVWPP should be spelled out in the DEIS. The mitigation plan states that the Applicant will contract with the fire districts for protection services during construction, but does not address either the current status of these negotiations, or what the role of the local fire districts will be once the facility is operational. Furthermore, CFE would like to know the status of negotiations regarding the Hayward Road improvements.

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Also, according to 2-19, each turbine has a fire sensor. The DEIS should address the availability or feasibility of fire suppression systems within turbines.

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F. Hazardous Materials 3.4

The DEIS does not address what procedures will be taken if a hazardous materials spill does occur either during construction or during the operation of the project. For example, the DEIS does not address what procedures will take place if a refueling truck loses its load. *See* 3.4-22.

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G. Wildlife 3.2

The DEIS does not fully address the effect of new roads and loss of vegetation on the use of the area by big game and other wildlife. Section 3.2-32 discusses the loss of wildlife due to the disturbance in the construction and the elimination of certain habitat used by the local wildlife, but the DEIS does not provide any projected mortality rates or much detail on mitigation of wildlife loss.

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H. Health and Safety 3.4

CFE agrees that the additional recommendations on 3.4-22 should be included in the project proposal.

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I. Erosion 3.1

The DEIS does not address the projected success of the Storm Water Pollution Prevention Plan (SWPPP) at controlling what the document indicates is a high runoff potential. *See 3.1-10.* The DEIS lists a number of mitigation practices the Applicant proposes to employ, but does not evaluate what the effect of these mitigation practices will be in preventing erosion.

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J. Wetlands 3.1

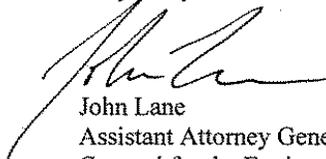
Unresolved issues surrounding the wetlands identified in the KVVWPP need to be addressed in greater detail, so that the mitigation proposal can be meaningfully evaluated.

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V. Conclusion

Thank you for the opportunity to comment on the KVVWPP Draft Environmental Impact Statement. If you have any questions regarding these comments, please do not hesitate to contact me at (360) 586-2438.

Very Truly Yours,



John Lane
Assistant Attorney General
Counsel for the Environment



01/22/2004 THU 15:26 FAX 3805863067

ARCHY & HIST PRESV

Kittitas Valley Wind PP#001
DEIS Comment -- State 4



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STATE OF WASHINGTON

Office of Archaeology and Historic Preservation

**ENERGY FACILITY SITE
EVALUATION COUNCIL**

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January 21, 2004

Irina Makarow
EFSEC
PO Box 43172
Olympia, WA 98504-3172

RE: Kittitas Valley Wind Power Project

Dear Ms. Makarow:

Thank you for the opportunity to comment on the DEIS for the Kittitas Valley Wind Power Project. We respectfully offer the following comments to the cultural resources report and mitigative measures for your consideration:

1. The document states that the project proponent is waiting to consult with OAHF concerning the indirect visual impacts on the North Branch Canal tunnel and other NRHP-eligible resources. We have not been contacted regarding these resources. Greg Griffith at 360-586-3073 is the appropriate person to assist with this process. 1
2. In section 3.8.3 the applicant has proposed avoidance of the two archaeological sites during construction and maintenance and decommissioning activities. We concur that avoidance would be an appropriate protection plan. There should be *no ground disturbing actions* of any depth or magnitude within the identified site boundaries for sites 45KT2396 (KVVWPP#1) and 45KT2397 (KVVWPP#2). 2
3. We further concur with the mitigative measure that all ground disturbing actions be monitored by a professional archaeologist. The archaeologist should flag off or otherwise delineate the sensitive area. Please be aware that during monitoring, if any archaeological deposits are observed, excavation in that area would cease, and the project either re-routed to avoid resources, or the resources would have to be tested for eligibility for listing in the NRHP. Any excavation or disturbance to the archaeological sites would require a permit from this office per RCW 27.53.060. 3
4. We recommend a written monitoring plan be developed to outline monitoring methods, expectations and procedures to follow in the event of an archaeological discovery. We would appreciate the opportunity to comment on this monitoring plan. 4
5. We concur that visual impacts upon historical are issues that are yet to be resolved (per Section 1.7.4). The area impacted by this undertaking has the potential for historical resources and should be reviewed for such. This office cannot determine the impacts of a project of this nature upon historic structures and landscapes until they are identified. We would recommend a professional survey of those properties 50-years of age or older within a one-mile radius of the affected area. A Historic Property Inventory form should 5

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be filled out for each property that is historic and submitted to this office. A blank copy of the form can be found at our website www.oahp.wa.gov.

6. Because impacts upon historical are issues that are yet to be resolved, we will need more information to comment on the mitigative measure for visual impacts. Please include these measures in the final EIS for review and comment.

Again, we appreciate the opportunity to comment. These comments are based on the information available at the time of this review and on the behalf of the State Historic Preservation Officer. Should additional information become available, our assessment may be revised. If you have any questions or concerns, please do not hesitate to contact me at (360) 586-3083 or by email at StepheneK@cted.wa.gov.

Sincerely,



Stephenie Kramer
Assistant State Archaeologist

cc: Tony Usibelli

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cont.
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