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BEFORE THE STATE OF WASHINGTON  
ENERGY FACILITY SITE EVALUATION COUNCIL

IN THE MATTER OF APPLICATION NO. 96-1 )  
 ) NO. 96-1  
OLYMPIC PIPELINE COMPANY )  
 )  
CROSS CASCADE PIPELINE PROJECT. )  
\_\_\_\_\_ )

PRE-FILED TESTIMONY OF  
DEE CAPUTO

ISSUE:

INADEQUACY OF APPLICATION AND IMPACTS ON ADAMS COUNTY

SPONSOR:  
ADAMS COUNTY

•What is your name and business address?

1  
2 Dee Caputo  
3 Adams County Planning & Building Department  
4 165 Nth First ST  
5 Othello, WA 98857  
6

7 •How are you employed?  
8

9 I am a full time employee with Adams County Planning & Building Department.  
10

11 •In what capacity are you employed by Adams County?  
12

13 I am the Planning Director and the Building Official.  
14

15 •How would you choose to describe your present duties with Adams County?  
16

17 I am responsible to manage and supervise a staff of three full time employees; construct and live  
18 within the annual budget (revised and adopted by the county commissioners) for both departments; make  
19 and be accountable for all the executive decisions that pertain to both departments; act in the capacity as the  
20 State Environmental Policy Act ("SEPA") Official and perform the duties of the Shoreline Administrator. I  
21 also engage in the various day to day activities relevant to each of the department titles under which I serve.  
22  
23  
24  
25

1  
2  
3  
4  
5  
6 •Are you authorized to make statements and commitments on behalf of Adams County?

7  
8 Statements: yes. Commitments: only for those items that fall within the job description of my  
9 position. I serve at the will of the county commissioners who have final say on decision making for Adams  
10 County.

11  
12 •What are the subject matters of your testimony?

13  
14 Purpose and need; pipeline design, construction and operation; impacts to the natural and built  
15 environment; health, safety, land use, recreation, socioeconomic impacts, mitigation and monitoring, and  
16 decommissioning.

17  
18 •Would you please summarize your work experience, education, and background which qualifies you to  
19 provide testimony on these subject?

20  
21 I have worked at Adams County Planning Department for 7 years (and Building Department  
22 approximately 5 years, at which time I was appointed as head to each of these Departments). During this  
23 time, I have been responsible to administer SEPA, to administer and enforce the Shorelines Master  
24 Program, and to conduct numerous aspects of land use (and building permit activity) within the county.  
25 Prior to my experience at Adams County, I was employed with Eastern Washington University's Urban  
and Regional Planning Department as a Research Assistant while in graduate school. In that capacity I  
worked on several community planning projects (involving issues of: water quality and quantity;  
transportation; community and economic development, and public participation) with professors and other  
students. Prior to that, I was employed by a non-profit organization, Oregon Rivers Council, to do research  
and mapping for Senator Hatfield and to promote adoption of certain river segments under the Wild and

1 Scenic Rivers Act. My education consists of undergraduate work at both Skagit Valley and Eastern Oregon  
2 State Colleges, where I obtained my degree in geography. I pursued my Masters in Urban and Regional  
3 Planning at EWU, obtaining it in 1991. While employed at Adams County, I served in the past on behalf of  
4 other planning efforts and projects, most notably on the State Wetlands Integrated Strategy (SWIS) and as a  
5 committee chair for the Washington State Rural Development Council. In addition, I am, and have been on  
6 the Board of Directors for the Planning Association for Washington (PAW) for years and on the Western  
7 Planning Resources, Inc. (WPR) Board since the summer of 1998. I am the editorial chair of the Western  
8 Planner Journal as of last summer and have been on the WP editorial board for four or five years.

9 •Would you briefly summarize your testimony?

10  
11 I intend to provide observations and make requests regarding the Draft Environmental Impact Statement  
12 ("DEIS") that pertain to potential mitigation options for the proposed pipeline project.

13  
14 •What have you reviewed in relation to preparing you testimony?

15  
16 I have reviewed the EFSEC Application submitted by Olympic Pipe Line and a copy of the DEIS  
17 which was prepared by Jones and Stokes. Also, I have reviewed a study of the Application and DEIS that  
18 was prepared by Shapiro and Associates on behalf of Adams, Grant and Kittitas Counties. I also reviewed  
19 the draft mitigation agreement document (11/18/97) crafted by Special Counsel on behalf of Adams  
20 County. I examined pre-filed written testimony with supporting document by Charles Batten on behalf of  
21 Cities of North Bend and Snoqualmie and Cascade Columbia Alliance. I have also reviewed selected DEIS  
22 comment letters.

23  
24 •Have you discussed or coordinated your testimony with other Adams County employees or officials?  
25

1 Briefly.

2  
3 •What employees or officials?

4  
5 Jerrilynn Hadley, Deputy Prosecuting Attorney and Steve Lyjek, County Engineer

6  
7 •Have you discussed or coordinated your testimony with other parties to this proceeding?

8  
9 Yes.

10  
11 •What parties?

12  
13 Dennis Reynolds, Attorney at Law; David Taylor, Planning Director, Kittitas County; Peter  
14 Comenzo, Senior Planner, Grant County and Ron Friesz, employed with the State of Washington  
15 Department of Fish and Wildlife ("WDFW") in Ephrata.

16  
17 •Do you have an opinion regarding the adequacy of the information contained in the project application?

18  
19 Yes.

20  
21 •What is your opinion?

22  
23 I am under the impression that parts of it are not complete, nor consistent throughout the document,  
24 and it does not provide language entirely clear or precise in many passages.

1 •What is the basis for your opinion?

2  
3 My impressions are largely derived from the contents of the Shapiro Report; the pre-filed testimony  
4 of Charles Batton; conversation with surrounding multi-county counterparts, my reading of the document,  
5 and DEIS comment letters.

6  
7 •Does the Draft Environmental Impact Statement cure these deficiencies in your opinion?

8  
9 While it may address some areas, it lacks answers for all the faults of the application document.

10  
11 •Why not?

12  
13 The DEIS falls short of necessary detail in many sections. Inaccuracies are noted, and unsupported  
14 statements are made.

15  
16 •Does Adams County have a preferred or recommended route?

17  
18 No direction has been given to me by my elected officials as to the County's preferred route. Given  
19 the amount of time, effort and money this project has cost and the few miles that are proposed to be located  
20 within Adams County, I would prefer the entire mileage be located outside of Adams County.

21  
22 •Would you briefly summarize potential impacts of peculiar or local concern to Adams County?

23  
24 Please see SEPA Response to DEIS, Adams County, 12/17/98, EXHIBIT DC-1

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•In you opinion are these impacts reasonable and expected if the project is constructed and operated?

Yes

•What is the basis for your opinion?

Actually, it is based on many sources, including: extensive conversations with colleagues (e.g., Ron Friesz, WDFW); similar responsibilities with previous projects (e.g., Waste Management’ regional landfill proposal); reading of related literature (e.g., Minimum Guidelines for Resource Lands and Critical Areas under the Growth Management Act, as defined by the Washington Department of Community, Trade and Economic Development) and informal dialogue with staff at the East Columbia Irrigation District, and Adams County Weed Board; recent discussion with Adams County road county engineer.

•Do you have an opinion whether the mitigation proposed to date by the applicant is sufficient to ameliorate these concerns?

Yes.

•What is your opinion?

Some of the proposed mitigation needs further work to be considered acceptable. In order for any Mitigation Agreement to serve its purpose, extremely clear, thorough details must be included which also describe a frequent, comprehensive monitoring program with contingency options in the event the

Mitigation Agreement fails to achieve its identified goals and objectives.

1  
2 •What is the basis for your opinion?

3  
4 I am operating under the same influences that I named in a previous answer regarding my sources  
5 for information on this project.

6  
7 •Do you have any specific comments about any shortcomings and recommended improvements in the  
8 DEIS or the project application and if so, what are they?

9  
10 Yes. In addition to my comments in response to the SEPA deadline of 12/17/98, about the project  
11 application /DEIS, I would add the following observations or comments:

12  
13 **PURPOSE and NEED**

14  
15 The DEIS narrowly defines the need as the desire by “shippers’ to acquire less expensive petroleum  
16 product from Western Washington refineries. If there is an increasing demand for petroleum products, then  
17 the solution is to increase supply, and every way possible to do so must be evaluated, including existing  
18 pipelines from the east. Information should be provided to determine if there are other pipelines in  
19 existence or planned that could provide a supply of petroleum from the south (Oregon) or east (Idaho).  
20 There should also be more information on the viability of the existing pipelines including any plans for  
21 expansion, retrofit, or addition of pumps to the existing pipelines. Information on the distribution pattern in  
22 Eastern Washington should be provided.

23  
24 **CONSTRUCTION OF THE PIPELINE**

1 One geotechnical issue involves the constructibility of the pipeline across, up and down some of the  
2 steep slopes which will be encountered a multiple locations along the route. The applicant's analysis to date  
3 of these slopes has indicated that some of the slopes require additional investigation and remediation  
4 measures to prevent mass wasting (sliding) of the hillside both during construction and operational periods.  
5 Successful completion and peer review of these investigations should be made conditions of permitting.  
6 Investigation and design of remediations and mitigation for portions of alignment affected by mast wasting  
7 is needed. The applicant should consider trenching to identify the extension of the Saddle Mountain Fault  
8 (AFSCA, p. 2.15-11) at some point prior to construction in order to allow for a complete, unpressured  
9 examination of contingencies. Analysis of soil/pipe interaction under seismic loading should be completed.  
10 Additional mitigation of the Saddle Mountain Fault Rupture (DEIS, p. 3-37) potential might include  
11 increasing the quantity of bedding surrounding the pipe and/or bedding the pipe in aggregates or other  
12 materials that tend to reduce the influence of ground motion on the pipeline. Also, corrosion issues are not  
13 addressed in the geology section of the DEIS. Corrosion is a threat to pipelines due to potential  
14 electrochemical attack of the steel pipe by aggressive soil/water, either individually or in combination. The  
15 potential for stray current affecting the pipeline also exists where it crosses other utilities. Design of  
16 corrosion protection for the pipeline based on site-specific soils investigation is needed.

## 17 WILDLIFE

18  
19  
20 No wildlife impacts or associated mitigation were described for operations impacts associated with  
21 potential pipeline leaks, spills or catastrophic events. Even though blasting will coincide with general  
22 timing restrictions for construction, this activity will potentially impact wildlife. Additional research on  
23 local wildlife impacts should be conducted and a description of mitigation offered. Migration, feeding and  
24 territorial maintenance could be adversely affected.

1 WATER RESOURCES

2  
3 Plans for providing alternative sources for water should be described in the event that water rights  
4 or legal obligations (as well as related water facilities) of local irrigation districts are adversely affected by  
5 construction or operation of the pipeline. Critical groundwater resources that are vital for municipal  
6 drinking water or that serve as sole source aquifers within the project area or that may be susceptible to  
7 contamination from a leak or spill, should be thoroughly studied and documented with adequate mitigation  
8 measures required to protect them.

9  
10 FISH AND FISH HABITAT

11  
12 Mitigation for damages to fish and aquatic resources caused by petroleum pollution and pollution of habitat  
13 modifications from petroleum spill clean-up activities should be described. Examples of potential impacts  
14 and mitigation should be offered at a minimum.

15  
16 AIR QUALITY

17  
18 Generally, the air quality document is thorough and complete. No significant impacts were  
19 identified that were not addressed in the document. However, adequate dust control will be essential to this  
20 project, especially in eastern Washington where conditions are typically dry and windy. With regard to  
21 water for mitigation of an event with high fugitive dust levels, more explanation is needed on how the  
22 water will be contained on site as a result of mitigation options that include water suppression methods.

23  
24 NOISE

1 With slight exception, the noise section of the AFSC is complete and credible. It is written to the  
2 level of detail that should be expected of an EIS noise section. However, in the DEIS, the noise section is  
3 inadequate. It contains no references to supporting technical data. Regarding the statement, “The noise  
4 impacts due to construction would be negligible,” (DEIS, p. 3190) this is inaccurate. Although the  
5 construction activities are temporary, there can and will be noise impacts that can adversely impact the  
6 surrounding communities (e.g., heavy trucks-90dBA). Short term mitigation measures should be described.

## 7 8 TRAFFIC AND TRANSPORTATION

9  
10 The magnitude of traffic volumes has been underestimated. The applicant should supply supporting  
11 data to justify trip generation estimates. Discussions on affected environment or existing conditions is  
12 inadequate. However, the magnitude of trips is not great and from a capacity viewpoint, impacts should be  
13 minor. Some mitigation will be required, specifically, the preparation of a Construction Transportation  
14 Management Plan. Staging areas need to be identified (AFSC p. 5.2-8). These locations are the most likely  
15 to result in traffic operations impacts, even though they may be short term. There is no discussion on traffic  
16 safety, although, pipeline construction traffic will use a variety of roadways from I-90 to local county roads.  
17 There are safety problem locations high accident areas, etc. These need to be researched and addressed. As  
18 stated in the DEIS, some roads will need to be closed as the pipeline route is dug across the right-of-way.  
19 These locations may be covered with steel sheets in the evening. As additional mitigation, all such  
20 construction locations require signing, flaggers and flashing lights at night for safety. Access roads may  
21 have capacity but research needs to be done to characterize what the current physical conditions of these  
22 roads are.

## 23 24 LAND AND SHORELINE USE

1 While the existing land use in both the corridor and the pump stations is described generally, it is  
2 virtually impossible to visualize what is located in and around the pipeline corridor. This section needs to  
3 be expanded with a discussion of the impacts of the various land uses (e.g., residential, commercial) by  
4 mile or segment to determine the real magnitude of the impacts. The adverse impacts on farmlands appears  
5 to be understated. The DEIS says that other than permanent loss of farmland at Kittitas Terminal and  
6 Othello Pump Station, (about 28.5 acres) the effects on farmlands would be short term construction impacts  
7 associated with the actual laying of the pipeline. This appears to understate the long term risk to adjacent  
8 farmlands of potential spills and explosions from the pipeline. Rangeland is also not thoroughly discussed  
9 as a crop grown for consumption of stock animals (DEIS, p. 3-241, P-3).

#### 10 11 VISUAL QUALITY AND AESTHETICS

12  
13 The AFSC adequately documents this element; however, it is not summarized accurately in the  
14 DEIS. It is inaccurate to say that scarring of disturbed areas would not likely be permanent. The disturbance  
15 to soils in the rangelands would permanently affect the vegetation and the soils, and, thus a linear trench  
16 scar would be created. In fact, new and potentially exotic vegetation may be attracted to this new habitat  
17 due to the change in soil conditions.

#### 18 19 SOCIO-ECONOMICS

20  
21 The socio-economic section is inadequate and fails to provide a thorough analysis, in particular, a  
22 cumulative assessment is deficient. It does not address the negative impact on the tanker trucking and barge  
23 companies and support services. The applicant should explain why 70% of the construction workers will be  
24 coming from out of state (DEIS, p. 3-287, P-3). If this is the case, only 273 jobs for local residents would  
25

1 be generated from the pipeline, triggering temporary housing needs and service impacts. In addition, car  
2 pooling and bussing to minimize the parking and transportation impacts will become more acute. The use  
3 of campgrounds by the workers may affect the availability of sites for summer peak usage. These impacts  
4 should be fully considered. The negative impact on the tanker trucking and barge companies and support  
5 services (e.g., gas stations, restaurants) along the route should also be discussed (DEIS, p. 3-295, P-5).

## 6 ENVIRONMENTAL HEALTH

### 7 8 Leak and Spill Detection

9  
10 The DEIS tends to use the term spill, a term which is commonly used in the industry and in  
11 Department of Transportation records. From an emergency planning and response perspective, the term  
12 frequently is non-descriptive of what actually occurs. Pipeline incidents are classified as hazardous  
13 materials incidents. Detailed analysis is likely to reveal that additional trained fire personnel will be  
14 required to mitigate an ensuing fire. Pipeline capacity is described in barrels containing 42 gallons each  
15 (DEIS, p. 2-2). At ultimate peak capacity, a non-monitored (by detector system) leak of 1% produces a  
16 volume of 46,200 gallons per day (p. 2-2), a 1% loss produces 1,050 gallons of released product per hour,  
17 or 17.5 gallons per minute. These volumes can be significant and result in large scale incidents which can  
18 challenge local resources. Mitigation should be described. Further description of how spills occur during  
19 pipeline testing is needed. Handling a flammable /combustible liquid pipeline emergency is a major  
20 undertaking for any emergency organization, particularly the first responding fire department. The  
21 following are some considerations which will need to be addressed when developing viable emergency  
22 response plans and mitigation strategies:

#### 23 24 Planning

Pipeline route maps through the community

Possible incident locations

The type and magnitude of the incident

-product type

-postulated release rate

-postulated release quantity

Potential high risk incident locations along the route

Response routes to incident locations

Obstructions which occur at an incident

Alternate routes and the need for equipment to respond from the other direction

Resource manual for notification information on pipeline shutdown and outside emergency assistance

Evaluation of products to be transported in the pipeline.

#### Accident Response Time and Capability

The documents do not focus sufficient attention on the impact the proposed pipeline will have on the planning, training, equipment, supplies and operating procedures of the fire, police and emergency medical organizations within the project vicinity. Examination of local districts' and county sheriffs' emergency response plans, options and limitations is an essential step in the design of an integrated emergency management plan for the pipeline. Review and consideration of the existing county mutual aid and disaster response plans, usually maintained under the direction of the county Emergency Management Office, is also necessary to determine the extent and allocation of emergency resources to large scale emergencies/events. Further, it may be necessary to incorporate any forthcoming general or specific OPL emergency plans (or spill prevention, control and countermeasure plans) into county emergency plans. The

1 review should consider local fire and emergency medical agency plans, usually maintained by specific local  
2 agencies, with awareness of local resource limitations, mutual aid agreements and inter-county  
3 communications capabilities. Relative to Adams, Grant and Kittitas Counties, an overall tri-county training  
4 agenda and implementation plan appear necessary. As an example, the DEIS does not appear to focus on  
5 the potential for fires/explosions resulting from a release of flammable liquids under pressure. Many of the  
6 reported pipeline accidents seem to involve this type of incident. The assessment of available hospital  
7 emergency room capacity for the tri-county area is not specific enough (DEIS, p. 3-308) since a worst case  
8 scenario would include multiple people suffering life-threatening trauma and severe burns. Hospital  
9 authorities should be asked to provide what they know they can handle. Another matter to consider would  
10 be the percentage of no-fly evacuation conditions and instances of flight unavailability due to bad weather  
11 that are likely to occur in a given time frame.

## 12 DECOMMISSIONING

13  
14 A Mitigation Agreement should contain language that obligates the applicant to conduct effective  
15 means to properly and legally decommission the pipeline if and when it should no longer cease to operate.

16  
17 •Do you endorse the testimony of other parties to the proceedings?

18  
19 Yes.

20  
21 •What parties?

22  
23 Grant, Kittitas, Franklin, King, and Snohomish Counties and associated cities. Because of  
24 insufficient time to have read all relevant testimony, I submit that this is not be an inclusive list.

1 •What testimony?  
2

3 DEIS comments; pre-filed written testimony.  
4

5 •Is it your understanding that the prefiled testimony you are presenting is only for the adjudicatory phase  
6 and not for the land use consistency review question?  
7

8 Yes. It is my understanding that the information developed in the land use consistency hearings  
9 will be incorporated into the adjudicatory phase, but that the consistency hearings are a separate phase of  
10 the process and that the pre-filing requirement does not apply to the consistency question.  
11

12 •Will Adams County therefore be submitting more detailed information regarding consistency issues  
13 during those hearings which are not being addressed in this adjudication phase?  
14

15 Yes.  
16

17 •Does this complete your testimony?  
18

19 Yes, it does, thank you very much.  
20  
21

22 END OF DIRECT TESTIMONY OF WITNESS  
23  
24  
25

DECLARATION OF SERVICE

The undersigned certifies under penalty of perjury that on the below date, I mailed or caused delivery of a true copy of this document as authorized by WAC 463-30-120(2)(a) to: the Energy Facility Site Evaluation Council and Counsel for All Parties at the regular office or residence thereof.

Dated this \_\_\_\_\_ day of \_\_\_\_\_ 1999 at Seattle, Washington.

\_\_\_\_\_  
Paula Polet

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**EXHIBIT DC-1**

December 17, 1998

Dee Caputo, Planning Director  
Adams County Planning Department  
165 North First St  
Othello, WA 99344

Floyd J. Rogalski, Cle Elum Ranger District  
Olympic Pipeline Team Leader  
803 West Second Street

RE: Olympic Pipeline Proposal

Regrettably, the tri-county process to retain a professional consultant on behalf of Grant, Kittitas and Adams Counties has dismally failed to yield either the consultant or the comments in time for the DEIS deadline, December 17, 1998. As a result, I humbly submit this short letter as an attempt to underline certain environmental and social issues which remain of local concern to Adams County regarding the proposed pipeline project. Understandably, the following list is considerably abbreviated due to obvious time constraints.

- 1.) The Saddle Mountain Range has been identified as one of the most geologically active areas of this state. Installing an underground pipeline here could potentially cause disaster in the event of slope failure or other major earth movements in the area.
- 2.) Groundwater is a major natural resource that is susceptible to contamination should this pipeline experience failure. Remediation efforts are costly, time consuming (when drinking water supplies are essential to survival) and sometimes ineffective. In addition, improperly abandoned well sites notoriously litter the landscape in this region. They serve as points of contact to the drinking water aquifers, thus making the groundwater more vulnerable to the effects of leakage, if failures occur.
- 3.) Fish and wildlife habitat conservation areas abound in the rural lands of our region. In addition to known species (e.g., sandhill cranes) likely to suffer impacts from this project if it is improperly timed or constructed, there are other species (e.g., burrowing owls) potentially jeopardized, given the intended location of the pipeline which includes suitable, unstudied habitat. Further surveys should be conducted to establish if mitigation measures are needed to protect species and habitats. Additionally, WDFW should be the lead partner in providing information and guidance for this particular topic.
- 4.) We now know that endangered species are prevalent in much of the project area waters as a result of recent and impending salmon stock listings. In no way does Adams County choose to be party to any action that may lead to a "take" in this regard. Adequate mitigation to avoid such an action is strongly advised.
- 5.) Disturbed soil has the propensity to grow weeds in this part of the world, given local soils and scant rainfall. Thus, any removal of dirt should be followed immediately with replacement measures to reduce or prevent weeds. Natural re-vegetation efforts are preferred to planting

exotic species and should be implemented for optimum recovery. Also, minimal human disturbance at staging areas for equipment and materials is essential. WDFW provided Adams County a list of criteria and strategies to assure maximum success in revegetation which should be incorporated into a detailed plan. Points include:

- a.) Use culturally developed varieties of native grass species. (Sample varieties include Secar or Goldar Bluebunch wheatgrass, Sherman Bluegrass, Canby Bluegrass, Thread and Needlegrass.)
- b.) Consider establishing native shrub and forbs if compatible with planned weed control.
- c.) Plan should be adaptive to different soil conditions, i. e., levels of alkalinity and moisture regimes.
- d.) Soil management should include proper protection (erosion and weed) and rotation of top soil horizon.
- e.) Disturbed area should be restored to natural contours consistent with adjacent landform.
- f.) Provide details on seed bed preparation, grass seed mixes, seeding rates, season of planting, fertilizers and techniques to establish proper seed/soil contact.
- g.) Develop strategies to protect seeded bed from erosion and competition from weeds. This could include straw mulch, hydro mulch, herbicides, etc.
- h.) Consider developing temporary irrigation systems where practical.
- i.) Monitor project area for a number of growing seasons to assure stand establishment; take corrective actions as needed.
- j.) Consult with local agencies with expertise and familiarity with local conditions including NRCS and the Vegetation Team of the WDFW (especially Jerry Benson).

6.) The number of people scheduled to be employed in constructing this pipeline is more than 3 times the total increase in population for all of Adams County for 1997-1998. Realistically, accommodating that number of new faces in our county, even for a short period of time, could put a strain on housing, law enforcement, and other public services. While the entire forecasted number of workers is not likely to temporarily settle in Adams County, nevertheless, potential impacts could certainly occur and should be considered.

7.) Anything regarding the pipeline project that negatively impinges on the continuing success of the East Columbia Basin Irrigation District and/or Bureau of Reclamation as they pertain to agricultural practices in the Basin Area is unacceptable to Adams County.

8.) As an addendum to this letter, please attach everything that is/will be submitted by Grant County for comments on the DEIS for the pipeline project.

Again, this letter is fashioned in haste and excludes many topics that bear observing as well. It is my contention ( in this instance) that is better to submit an incomplete comment for the record than to remain silent about all. Thank you for your time and attention.

Respectfully,

---

Dee Caputo, Adams County Planning Director

cc Adams County Board of Commissioners  
Peter Comenzo, Grant County Planning  
Dennis Reynolds, Special Counsel