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BEFORE THE STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL

IN RE APPLICATION NO. 96-1)
)
OLYMPIC PIPE LINE COMPANY:)
CROSS CASCADE PIPELINE PROJECT)
)
)

EXHIBIT _____ (KC - RT1)
REBUTTAL TESTIMONY OF KATY CHANEY
ISSUE: GENERAL ENVIRONMENTAL IMPACTS
SPONSOR: OLYMPIC PIPE LINE COMPANY

1 **R. State your name.**

2 A. Katy Chaney

3 **Q. What topics will you address in your rebuttal testimony?**

4 A. My rebuttal testimony is intended to respond to all of the testimony filed concerning
5 environmental or land use impacts related to the project, and the mitigation of those impacts. My
6 rebuttal testimony will address the following topics:

7 (1) Olympic's approach to environmental assessment and mitigation;

8 (2) Visual Impacts;

9 (3) Noise Impacts;

10 (4) Geotechnical hazards;

11 (5) Stream Crossings, Water Quality and Water Resources

12 (6) Fish, Wildlife and Endangered Species

13 (7) Wetlands and Vegetation;

14 (8) Recreation;

15 (9) Land Use, including Agriculture.

16 For the Council's convenience, my rebuttal testimony has been divided into several different
17 exhibits, organized roughly according to the likely organization of the adjudicatory proceedings.
18 This exhibit addresses: Olympic's General Approach to Environmental issues, Visual Impacts,
19 and Noise Impacts.

20 **Olympic's Approach to Environmental Assessment & Mitigation**

21 **Q. Several witnesses have criticized Olympic for not providing sufficient information about**
22 **the project's environmental impacts. How do you respond to that criticism?**

23 A. I think that criticism is unjustified. Since Dames & Moore became involved in this project in
24 mid-1995, we have conducted extensive environmental analysis of the project's impacts and we
25 have worked with Olympic to avoid, minimize and mitigate those environmental impacts.

1 Dames & Moore has conducted field work and studies on geology and soils, water resources, air
2 quality, vegetation, wetlands, wildlife and wildlife habitat, aquatic resources, noise, land use,
3 socioeconomics, transportation, public services, recreation, historical and cultural resources, and
4 visual resources. Wetland biologists and other scientists have walked the entire pipeline
5 corridor. As of March 22, 1999, Dames & Moore has spent over 35,398 hours gathering data,
6 working in the field, preparing the Application, and meeting with local, state and federal agencies
7 to discuss aspects of the project.

8 The results of Dames & Moore's evaluations are provided in the revised Application for
9 Site Certification and numerous technical reports that are incorporated into the Application by
10 reference and together comprise an exhibit in these proceedings. In response to specific
11 inquiries, Dames & Moore has conducted additional investigation and provided additional
12 information and analysis to various parties.

13 In reviewing the testimony of witnesses who have criticized Olympic for not providing
14 certain information, I have determined that most of information at issue falls into one of two
15 categories. Either it is information that was in fact provided in the Application or in one of the
16 technical reports, or it is information that Olympic has already committed to gather and provide
17 to EFSEC before proceeding with construction. It is important to understand that the Application
18 was never intended to be a final design document. With a project of this size, it is reasonable, if
19 not essential, that some of the analysis necessary to determine the final design be postponed until
20 the final route of the pipeline is determined by EFSEC and site certification is granted. To
21 require an Applicant to spend many millions of additional dollars on providing this final design
22 information prior to certification would turn what is already a very expensive process into one
23 that would simply be cost-prohibitive.

24 **Q. Can you explain, in general, Olympic's approach to mitigating environmental impacts**
25 **associated with the proposed project?**

1 A. Yes. In the first instance, Olympic has attempted to avoid or prevent environmental impacts. It
2 was for this reason that Olympic selected a route that would follow existing utility or roadway
3 corridors as much as possible. Beyond that Olympic has chosen a route in order to avoid areas
4 such as wetlands and sensitive habitat. Olympic has also proposed construction windows that
5 would avoid spawning areas and sensitive habitat during critical life stage periods. Subsequent to
6 filing the revised Application, Olympic has continued to work with federal, state and local
7 agencies as well as Tribes to adjust the proposed route to avoid or minimize environmental
8 impacts. As explained in more detail in Claude Harshbarger's testimony, Olympic has adjusted
9 several stream crossings in order to avoid disturbance to the stream by utilizing horizontal
10 directional drilling or existing bridges.

11 In instances in which impacts could not be avoided, Olympic has attempted to minimize
12 and mitigate those impacts. A summary of the mitigation measures that Olympic has proposed is
13 provided in Section 1.4 of the Application.

14 **Q. Did Olympic consider whether alternative routes would be more effective at avoiding or**
15 **minimizing environmental impacts?**

16 A. Yes. Olympic consideration of alternatives is addressed both in the Application at Part 9, and in
17 the Alternatives Analysis provided to the U.S. Army Corps of Engineers in connection with
18 Olympic's section 404 permit application. A copy of that Alternatives Analysis is provided as
19 Exhibit KC-3

20 **Q. In his testimony, Steven Hughes purported to provide a matrix analysis comparing the**
21 **overall environmental impact of the proposed project to the no action alternative. What is**
22 **your reaction to his testimony?**

23 A. I did not find his analysis very convincing for two basic reasons. First, his analysis appears to
24 depend entirely upon the spill risk analysis provided by James Wesley Miller. Several other
25 Olympic witnesses (including John Robinson, John Felton, Paul Gallagher, and Harold Zarling)

1 are testifying in rebuttal to Dr. Miller. Second, Mr. Hughes has failed to take into account other
2 environmental benefits of the proposed project, which include the decrease of human safety risks
3 associated with tanker truck traffic, and the decrease in hazardous air pollution associated with
4 barge loading in the Portland-Vancouver airshed (see rebuttal testimony of Martha Moore)

5 **Q. Peter Morrison (CCA) filed a CD-ROM containing 33 maps along with testimony in which**
6 **he stated that he intends to make some sort of presentation to EFSEC displaying these**
7 **maps on a large screen and explaining them. What is your reaction to his testimony and**
8 **the maps found on the CD-ROM?**

9 A. It is impossible to respond to Mr. Morrison's testimony because it does not even outline the
10 presentation that he intends to make in front of EFSEC. I have reviewed the maps contained on
11 the CD-ROM, and found them to be relatively uninformative because they use vague terminology
12 without providing any useful definitions. For example, the first map purports to identify "areas
13 susceptible to erosion" without including any information that would allow viewer to understand
14 the level of susceptibility. Leaving those problems aside, for the moment, the maps do tend to
15 illustrate that Olympic has carefully routed the pipeline to avoid flood plains, geologic hazards
16 and other sensitive areas. If and when Mr. Morrison makes a presentation to EFSEC concerning
17 these maps, I would want an opportunity to rebut his presentation.

18 Visual Impacts

19 **Q. How were the visual impacts of the project evaluated?**

20 A. Yes. There is a quite extensive visual analysis provided in Section 5.1 of the Application,
21 starting on page 5.1-73 and continuing through page 5.1-103. The analysis includes a milepost-
22 to-milepost description of the potential visual impacts along the proposed route, as well as
23 simulated representations of views along pipeline right of way and at facilities.

24 **Q. In his testimony, Douglass Pineo (WDOE) raises concerns about the visual impacts in the**
25 **vicinity of the Columbia River crossing. Do you believe those concerns are justified?**

1 A. No. Olympic proposes to use horizontal directional drilling to cross under the river, so the
2 crossing itself would not be visible to the public. There will be some temporary scarring that will
3 be visible along the approaches to the river until the vegetation grows back. As part of the site
4 restoration, however, Olympic will replant the area with native species at a time most appropriate
5 to their success as determined by a vegetative specialist. The revegetation is intended to control
6 erosion and to prevent the establishment or spread of noxious weeds. As Olympic has agreed
7 with the Yakima Indian Nation, shrub-steppe habitats will be restored along the entire width of
8 the construction corridor with a mix of shrub and grass seeds that are native to the area. Areas
9 currently composed of herbaceous vegetation will be restored with a seed mix native to the area.

10 **Q. Did you review the testimony of Randy Person (Parks) concerning visual impacts to**
11 **recreational users in the vicinity of the Twin Falls State Park?**

12 A. Yes. I agree with Randy's assessment that the pipeline route will not be visible from the Twin
13 Falls Trail and that there will be no recreational or visual impacts to the Twin Falls Trail due to
14 pipeline construction along the proposed pipeline route.

15 **Q. Mr. Person also testified concerning limited visual impacts to users of the John Wayne**
16 **Trail. What is your reaction to his testimony?**

17 A. I agree with Mr. Person that the visual impacts would be limited to the area between the trail and
18 a small level bench, a distance of a few hundred feet. Tree removal will be limited to minimize
19 impacts, and the trees cut in a zig-zag pattern along the edge whenever possible to reduce the
20 visual impacts of a "straight-line cut". The new corridor will also be revegetated which will also
21 soften the appearance of the new corridor.

22 **Q. Mr. Person also testified concerning limited visual impacts at the entrance into State Park**
23 **property near SE 162nd Street. What is your reaction to his testimony?**

24 A. As Mr. Person noted in his testimony, there are many driveways or small gravel roads serving
25 new homes in the area, and the pipeline corridor will look similar in width. However, unlike the

1 driveways and gravel roads, the pipeline corridor will be revegetated, and would appear more
2 similar to a trail than the area roadways.

3 **Noise Impacts**

4 **Q. What analysis was done of noise impacts associated with the project?**

5 A. Dames & Moore conducted a noise impact analysis to assess the operational and construction
6 noise impacts at the proposed pump stations and at the Kittitas terminal. That analysis is found
7 in Section 4.1.1 of the Application.

8 **Q. Have you reviewed the testimony filed by Mark Pedersen on behalf of the Eastern
9 Washington Counties, as well as the testimony of Peter Comenzo (Grant)**

10 A. Yes. Mr. Pederson, Mr. Comenzo and Dee Caputo concluded that the analysis of noise impacts
11 contained in the Application is “complete and credible” and I agree with them. Several witnesses
12 have criticized the noise analysis in the DEIS, but none have criticized Olympic’s Application.

13 **Q. Will there be noise from the operating pipeline?**

14 A. No, as with the existing north-south pipeline, the only noise is at the pump stations. The pump
15 stations at Thrasher and North Bend will be enclosed to reduce or eliminate noise levels. The
16 pipeline will be buried a minimum of four feet underground, and there is no noise associated
17 with it.

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19 DATED: March 24, 1999

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21 _____
22 Katy Chaney
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