



STATE OF WASHINGTON
ENERGY FACILITY SITE EVALUATION COUNCIL
PO Box 43172 • Olympia, Washington 98504-3172

DETERMINATION OF NONSIGNIFICANCE

Pursuant to Chapter 463-47 WAC and WAC 197-11-340

For the

WILD HORSE WIND POWER PROJECT

DECEMBER 2005 REQUEST TO AMEND THE SITE CERTIFICATION AGREEMENT

Description of current proposal: Puget Sound Energy (PSE) has filed a request with the Energy Facility Site Evaluation Council (EFSEC) to amend the Site Certification Agreement (SCA) for the Wild Horse Wind Power Project. If approved, the amendment would allow the following project changes:

- (1) Addition of a 12,000 square foot Maintenance Center to the project site near Vantage highway, including the Informational Kiosk and Visitor parking; the footprint for this facility would be 5 acres, an increase of 3 acres from the approved proposal. The facility would also include a septic system for domestic waste water and a water well exempt pursuant to the requirements of RCW 90.44.050.
- (2) A re-alignment of a portion of the 230 kilovolt (kv) Transmission Feeder Line on the Project Site.

Proponent:

Puget Sound Energy
10885 NE 4th Street
Bellevue, WA 98009
Scott Williams
Phone: 253-670-2319

Address and location of proposal: 25901 Vantage Highway, Ellensburg, WA 98926. The Wild Horse Wind Power Project is located on 8,600 acres approximately 13 miles east of Ellensburg, Washington on Whiskey Dick Mountain, in eastern Kittitas County.

Titles of documents that have been previously adopted: The lead agency issued the Wild Horse Wind Power Project Draft and Final Environmental Impact Statements for its review of the Project application for site certification, and hereby incorporates them by reference for

consideration of this proposal. The lead agency also issued an Addendum to the Environmental Impact Statement on January 23, 2006.

Previously Adopted documents are available for inspection at: All SEPA documents being considered with respect to this proposal are available at the Energy Facility Site Evaluation Council, 925 Plum Street NE, Olympia, Washington, 98504-3172, Monday through Friday (excluding state holidays), from 8 am to 5 pm, and on the EFSEC web site at www.efsec.wa.gov.

Determination of Nonsignificance: This threshold determination is based on the information contained in the following documents and other information on file with the lead agency:

- Request for an Amendment to the Site Certification Agreement Regarding Relocation of the Maintenance Facility And Transmission Line Re-Alignment, filed by Puget Sound Energy on December 13, 2005 (available for inspection at www.efsec.wa.gov/wildhorse.html or the EFSEC office);
- Environmental Checklist submitted by Puget Sound Energy on January 23, 2006 (available for inspection at www.efsec.wa.gov/wildhorse.html or the EFSEC office).

Lead agency action: Action on this proposal will be consistent with Chapter 463-66 WAC. The Energy Facility Site Evaluation Council may take action to approve or deny this request following public comment during a Special Council Meeting as follows:

1:00 p.m., Thursday, February 2, 2006
Kittitas County Fairgrounds – Fine Arts Building
512 N Poplar ST
Ellensburg, Washington 98206

Public Comment: This DNS is issued pursuant to Chapter 463-47 WAC and WAC 197-11-340. The DNS is exempt from public comment because the proposal does not meet the criteria of WAC 197-11- 340(2)(a). However, comments on the request to amend the SCA will be taken at the Special Meeting as noted above.

Responsible official: Allen J. Fiksdal
Position/title: EFSEC Manager
Address: PO Box 43172, Olympia, WA 98504-3172
Phone: 360-956-2152

There is no agency appeal.

Date: January 23, 2006



Allen J. Fiksdal, EFSEC Manager

Attachment: Environmental Checklist

WAC 197-11-960 Environmental checklist.

ENVIRONMENTAL CHECKLIST

Purpose of checklist:

The State Environmental Policy Act (SEPA), chapter 43.21C RCW, requires all governmental agencies to consider the environmental impacts of a proposal before making decisions. An environmental impact statement (EIS) must be prepared for all proposals with probable significant adverse impacts on the quality of the environment. The purpose of this checklist is to provide information to help you and the agency identify impacts from your proposal (and to reduce or avoid impacts from the proposal, if it can be done) and to help the agency decide whether an EIS is required.

Instructions for applicants:

This environmental checklist asks you to describe some basic information about your proposal. Governmental agencies use this checklist to determine whether the environmental impacts of your proposal are significant, requiring preparation of an EIS. Answer the questions briefly, with the most precise information known, or give the best description you can.

You must answer each question accurately and carefully, to the best of your knowledge. In most cases, you should be able to answer the questions from your own observations or project plans without the need to hire experts. If you really do not know the answer, or if a question does not apply to your proposal, write "do not know" or "does not apply." Complete answers to the questions now may avoid unnecessary delays later.

Some questions ask about governmental regulations, such as zoning, shoreline, and landmark designations. Answer these questions if you can. If you have problems, the governmental agencies can assist you.

The checklist questions apply to all parts of your proposal, even if you plan to do them over a period of time or on different parcels of land. Attach any additional information that will help describe your proposal or its environmental effects. The agency to which you submit this checklist may ask you to explain your answers or provide additional information reasonably related to determining if there may be significant adverse impact.

Use of checklist for nonproject proposals:

Complete this checklist for nonproject proposals, even though questions may be answered "does not apply." IN ADDITION, complete the SUPPLEMENTAL SHEET FOR NONPROJECT ACTIONS (part D).

For nonproject actions, the references in the checklist to the words "project," "applicant," and "property or site" should be read as "proposal," "proposer," and "affected geographic area," respectively.

A. BACKGROUND

1. Name of proposed project, if applicable: **Wild Horse Wind Power Project (WHWPP) Site Certification Agreement Amendment**

2. Name of applicant: **Puget Sound Energy**

3. Address and phone number of applicant and contact person: **Scott Williams, PO Box 90868, MS-PSE-09S, Bellevue, WA 98009-0868**

4. Date checklist prepared: **January 22, 2006**

5. Agency requesting checklist: **Energy Facility Site Evaluation Council**

6. Proposed timing or schedule (including phasing, if applicable): **Construction on the amended portions of the project would begin in early February 2006.**

7. Do you have any plans for future additions, expansion, or further activity related to or connected with this proposal? If yes, explain. **Yes. The proposed amendments affect portions of the WHWPP. Construction on the WHWPP began in mid-October 2005 and is expected to continue until the end of 2006.**

8. List any environmental information you know about that has been prepared, or will be prepared, directly related to this proposal. **Cultural Resources Survey Letter Report, Lithic Analysts, December 2005; Habitat Evaluation Survey Report, Smayda Environmental, December, 2005. Draft and Final EISs for the Wild Horse Wind Power Project.**

9. Do you know whether applications are pending for governmental approvals of other proposals directly affecting the property covered by your proposal? If yes, explain. **No.**

10. List any government approvals or permits that will be needed for your proposal, if known. **None.**

11. Give brief, complete description of your proposal, including the proposed uses and the size of the project and site. There are several questions later in this checklist that ask you to describe certain aspects of your proposal. You do not need to repeat those answers on this page. (Lead agencies may modify this form to include additional specific information on project description.)

The Final EIS for the Wild Horse Wind Power Project (WHWPP) was published by EFSEC on May 16, 2005. On July 26, 2005, Governor Gregoire approved the Site Certification Agreement (SCA) for the project. Construction began in mid-October. On December 13, 2005, The Certificate Holder, Puget Sound Energy, requested an amendment to the SCA.

The Certificate Holder has requested an amendment to the SCA in order to add an approximately 12,000 square foot Maintenance Center to the site near Vantage Highway and to realign a portion of the project's Transmission Feeder Line. The proposed changes would not substantially alter the substance of any provisions of the SCA, or have a significant detrimental effect upon the environment.

The originally permitted concept provided for an Operation and Maintenance Facility with a building footprint of 5,000 square feet and a total footprint of two acres. It was to be located at the high point of the first ridge close to tower #C2. PSE desires to change this concept to utilize the permitted area as an Operations Center, which will include visitor accommodations, and to locate a larger Maintenance Center close the Vantage Highway as shown in Exhibit A, attached hereto. The new Maintenance Center would have a building footprint of approximately 12,000 square feet. The entire facility would be approximately five acres in size and would integrate the Informational Kiosk and Visitor Parking, for which two acres was allotted in the approved plan (the graveled area currently being used for construction trailers and vehicle parking). Therefore, the proposed change would result in an increase of three acres to the project footprint over the currently approved configuration.

A partial re-alignment of the project's 230kV Transmission Feeder Line, as shown in Exhibit A, is also proposed. PSE desires to move the transmission line several hundred feet away from the Operations Center, so it will not block skyline of views from the facility. As originally permitted, the line passed very close to the Operations Center. The

concern was it would be directly in the field of view of some of the more spectacular visual panoramas available from this ridge, including views of Mount Rainier and Mount Hood.

12. Location of the proposal. Give sufficient information for a person to understand the precise location of your proposed project, including a street address, if any, and section, township, and range, if known. If a proposal would occur over a range of area, provide the range or boundaries of the site(s). Provide a legal description, site plan, vicinity map, and topographic map, if reasonably available. While you should submit any plans required by the agency, you are not required to duplicate maps or detailed plans submitted with any permit applications related to this checklist. **The 8,600 acre site is located approximately 13 miles east of Ellensburg on Whiskey Dick Mountain, in Eastern Kittitas County.**

B. ENVIRONMENTAL ELEMENTS

1. Earth

- a. General description of the site (circle one): Flat, rolling, hilly, steep slopes, mountainous, other
- b. What is the steepest slope on the site (approximate percent slope)? **Forty percent.**

TO BE COMPLETED BY APPLICANT

- c. What general types of soils are found on the site (for example, clay, sand, gravel, peat, muck)? If you know the classification of agricultural soils, specify them and note any prime farmland. **Rock Creek Series, Argabak Series, Vantage Series**
- d. Are there surface indications or history of unstable soils in the immediate vicinity? If so, describe. **No.**
- e. Describe the purpose, type, and approximate quantities of any filling or grading proposed. Indicate source of fill. **Only minimal grading of the transmission line route and Maintenance Center site will be required.**
- f. Could erosion occur as a result of clearing, construction, or use? If so, generally describe. **Minimal Erosion could occur during construction.**
- g. About what percent of the site will be covered with impervious surfaces after project construction (for example, asphalt or buildings)? **Approximately 10%.**
- h. Proposed measures to reduce or control erosion, or other impacts to the earth, if any: **The measures contained in the Surface Water Pollution Prevention Plan approved for the WHWPP will be followed.**

a. Air

- a. What types of emissions to the air would result from the proposal (i.e., dust, automobile, odors, industrial wood smoke) during construction and when the project is completed? If any, generally describe and give approximate quantities if known. **Minimal dust during construction.**

b. Are there any off-site sources of emissions or odor that may affect your proposal? If so, generally describe. **No.**

b. Proposed measures to reduce or control emissions or other impacts to air, if any: **All the mitigation measures in the EIS for the WHWPP would be followed.**

3. Water

a. Surface:

- 1) Is there any surface water body on or in the immediate vicinity of the site (including year-round and seasonal streams, saltwater, lakes, ponds, wetlands)? If yes, describe type and provide names. If appropriate, state what stream or river it flows into. **No.**

- 2) Will the project require any work over, in, or adjacent to (within 200 feet) the described waters? If yes, please describe and attach available plans. **No.**

- 3) Estimate the amount of fill and dredge material that would be placed in or removed from surface water or wetlands and indicate the area of the site that would be affected. Indicate the source of fill material. **None.**

- 4) Will the proposal require surface water withdrawals or diversions? Give general description, purpose, and approximate quantities if known. **No.**

- 5) Does the proposal lie within a 100-year floodplain? If so, note location on the site plan. **No.**

- 6) Does the proposal involve any discharges of waste materials to surface waters? If so, describe the type of waste and anticipated volume of discharge. **No.**

b. Ground:

- 1) Will ground water be withdrawn, or will water be discharged to ground water? Give general description, purpose, and approximate quantities if known. **A domestic well would be installed at the location of the Maintenance Center to provide potable water. Water would be delivered to the Operations Center. Overall demand would be similar to the original layout.**

- 2) Describe waste material that will be discharged into the ground from septic tanks or other sources, if any (for example: Domestic sewage; industrial, containing the following chemicals. . . ; agricultural; etc.). Describe the general size of the system, the number of such systems, the number of houses to be served (if applicable), or the number of animals or humans the system(s) are expected to serve. **Septic systems would be installed at the Maintenance Center and operations Center to handle domestic sewage. Overall loads would be similar to the original layout.**

c. Water runoff (including stormwater):

- 1) Describe the source of runoff (including storm water) and method of collection and disposal, if any (include quantities, if known). Where will this water flow? Will this water flow into other waters? If so, describe. **Runoff from impervious surfaces would be dispersed and allowed to infiltrate into the ground.**

2) Could waste materials enter ground or surface waters? If so, generally describe. **No.**

d. Proposed measures to reduce or control surface, ground, and runoff water impacts, if any: **Mitigation measures identified in the EIS for the WHWPP would be followed.**

4. Plants

a. Check or circle types of vegetation found on the site:

- _____ deciduous tree: alder, maple, aspen, other
_____ evergreen tree: fir, cedar, pine, other
 _____ shrubs
 _____ grass
_____ pasture
_____ crop or grain
_____ wet soil plants: cattail, buttercup, bullrush, skunk cabbage, other
_____ water plants: water lily, eelgrass, milfoil, other
_____ other types of vegetation

b. What kind and amount of vegetation will be removed or altered? **Approximately three acres of low quality sage brush habitat would be permanently cleared for the Maintenance Center. Temporary clearing for construction of the transmission line would be required as necessary to allow access for construction vehicles.**

c. List threatened or endangered species known to be on or near the site. **None.**

d. Proposed landscaping, use of native plants, or other measures to preserve or enhance vegetation on the site, if any: **The areas of temporary disturbance would be restored in accordance with the Construction Site Restoration Plan approved for the WHWPP.**

5. Animals

a. Circle any birds and animals which have been observed on or near the site or are known to be on or near the site:

birds: hawk, heron, eagle, songbirds, other:

mammals: deer, bear, elk, beaver, other: **Small mammals such as coyote, badger, pocket gopher, mice, etc.**

fish: bass, salmon, trout, herring, shellfish, other:

- b. List any threatened or endangered species known to be on or near the site. **None.**

- c. Is the site part of a migration route? If so, explain. **No.**
- d. Proposed measures to preserve or enhance wildlife, if any: **Mitigation measures identified in the EIS for the WHWPP would be followed.**

6. Energy and natural resources

- a. What kinds of energy (electric, natural gas, oil, wood stove, solar) will be used to meet the completed project's energy needs? Describe whether it will be used for heating, manufacturing, etc. **Electricity would be required to meet the needs of the Maintenance Center.**
- b. Would your project affect the potential use of solar energy by adjacent properties? If so, generally describe. **No.**
- c. What kinds of energy conservation features are included in the plans of this proposal? List other proposed measures to reduce or control energy impacts, if any: **The building would comply with Washington State Energy Code requirements.**

7. Environmental health

- a. Are there any environmental health hazards, including exposure to toxic chemicals, risk of fire and explosion, spill, or hazardous waste, that could occur as a result of this proposal? If so, describe. **No.**

1) Describe special emergency services that might be required. **None.**

2) Proposed measures to reduce or control environmental health hazards, if any: **None.**

b. Noise

- 1) What types of noise exist in the area which may affect your project (for example: traffic, equipment, operation, other)? **None.**

- 2) What types and levels of noise would be created by or associated with the project on a short-term or a long-term basis (for example: traffic, construction, operation, other)? Indicate what hours noise would come from the site. **Some noise would be associated with construction of the Maintenance Center and Transmission line. Operation related noise would be minimal.**

3) Proposed measures to reduce or control noise impacts, if any: **Mitigation Measures identified in the WHWPP EIS would be implemented.**

8. **Land and shoreline use**

- a. What is the current use of the site and adjacent properties? **Vacant. The property is part of the WHWPP.**

- b. Has the site been used for agriculture? If so, describe. **Yes. The site has been used for livestock grazing.**

- c. Describe any structures on the site. **None.**

- d. Will any structures be demolished? If so, what? **No.**

- e. What is the current zoning classification of the site? **Forest and Range.**

- f. What is the current comprehensive plan designation of the site? **Forest and Range.**

- g. If applicable, what is the current shoreline master program designation of the site? **N/A**

- h. Has any part of the site been classified as an "environmentally sensitive" area? If so, specify. **No.**

- i. Approximately how many people would reside or work in the completed project? **Approximately 20 people would work in the proposed Maintenance Center.**

- j. Approximately how many people would the completed project displace? **None.**

- k. Proposed measures to avoid or reduce displacement impacts, if any: **None.**

1. Proposed measures to ensure the proposal is compatible with existing and projected land uses and plans, if any: **Mitigation Measures in the EIS for the WHWPP would be followed.**

9. **Housing**

- a. Approximately how many units would be provided, if any? Indicate whether high, middle, or low-income housing. **None.**
- b. Approximately how many units, if any, would be eliminated? Indicate whether high, middle, or low-income housing. **None.**
- c. Proposed measures to reduce or control housing impacts, if any: **None.**

10. **Aesthetics**

- a. What is the tallest height of any proposed structure(s), not including antennas; what is the principal exterior building material(s) proposed? **Transmission structures would be approximately 75-foot tall wood poles. Principal exterior building materials would be metal and masonry.**
- b. What views in the immediate vicinity would be altered or obstructed? **None.**
- c. Proposed measures to reduce or control aesthetic impacts, if any: **The proposal would relocate the transmission line proposed as part of the WHWPP so as to make it less visible to the public. Moving the Maintenance Center down to Vantage Highway would result in a less obtrusive structure along the ridge line where it was originally proposed.**

11. **Light and glare**

- a. What type of light or glare will the proposal produce? What time of day would it mainly occur? **The maintenance center would have yard lights that would be visible during nighttime.**
- b. Could light or glare from the finished project be a safety hazard or interfere with views? **No.**
- c. What existing off-site sources of light or glare may affect your proposal? **None.**
- d. Proposed measures to reduce or control light and glare impacts, if any: **None.**

12. Recreation

- a. What designated and informal recreational opportunities are in the immediate vicinity? **None.**

- b. Would the proposed project displace any existing recreational uses? If so, describe. **No.**

- c. Proposed measures to reduce or control impacts on recreation, including recreation opportunities to be provided by the project or applicant, if any: **None.**

13. Historic and cultural preservation

- a. Are there any places or objects listed on, or proposed for, national, state, or local preservation registers known to be on or next to the site? If so, generally describe. **No.**

- b. Generally describe any landmarks or evidence of historic, archaeological, scientific, or cultural importance known to be on or next to the site. **None.**

- c. Proposed measures to reduce or control impacts, if any: **Mitigation Measures identified in the WHWPP EIS would be followed.**

14. Transportation

- a. Identify public streets and highways serving the site, and describe proposed access to the existing street system. Show on site plans, if any. **Vantage Highway.**

- b. Is site currently served by public transit? If not, what is the approximate distance to the nearest transit stop? **No.**

- c. How many parking spaces would the completed project have? How many would the project eliminate? **Approximately thirty parking spaces would be provided, none would be eliminated.**

- d. Will the proposal require any new roads or streets, or improvements to existing roads or streets, not including driveways? If so, generally describe (indicate whether public or private). **No.**

- e. Will the project use (or occur in the immediate vicinity of) water, rail, or air transportation? If so, generally describe. **No.**
- f. How many vehicular trips per day would be generated by the completed project? If known, indicate when peak volumes would occur. **Approximately 100 trips per day.**
- g. Proposed measures to reduce or control transportation impacts, if any: **None.**

15. Public services

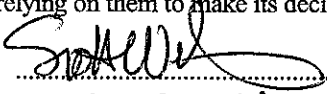
- a. Would the project result in an increased need for public services (for example: fire protection, police protection, health care, schools, other)? If so, generally describe. **No.**
- b. Proposed measures to reduce or control direct impacts on public services, if any. **Mitigation measures identified in the EIS for the WHWPP would be followed.**

16. Utilities

- a. Circle utilities currently available at the site: electricity, natural gas, water, refuse services, ~~telephone~~, sanitary sewer, septic system, other.
- b. Describe the utilities that are proposed for the project, the utility providing the service, and the general construction activities on the site or in the immediate vicinity which might be needed. **Electricity will be provided by Kittitas County PUD, telephone will be provided by Ellensburg Telephone.**

C. SIGNATURE

The above answers are true and complete to the best of my knowledge. I understand that the lead agency is relying on them to make its decision.

Signature: 

Date Submitted: 01-22-06

1 The originally permitted concept provided for an Operation and Maintenance Facility
2 with a building footprint of 5,000 square feet and a total footprint of two acres. It was
3 to be located at the high point of the first ridge close to tower #C2. PSE desires to
4 change this concept to utilize the permitted area as an Operations Center, which will
5 include visitor accommodations, and to locate a larger Maintenance Center close the
6 Vantage Highway as shown in Exhibit A, attached hereto. The new Maintenance
7 Center would have a building footprint of approximately 12,000 square feet. The
8 entire facility would be approximately five acres in size and would integrate the
9 Informational Kiosk and Visitor Parking, for which two acres was allotted in the
10 approved plan (the graveled area currently being used for construction trailers and
11 vehicle parking).

12
13 PSE's recent experience with construction of a similar project (our Hopkins Ridge
14 project in Columbia County) is that the permitted facility is adequate for day to day
15 operations but does not provide enough shop space or spare parts storage for the
16 larger and heavier turbine components. Since both Hopkins Ridge and Wild Horse
17 utilize identical turbine components, PSE wishes to provide expanded facilities at
18 Wild Horse that can service both projects. In addition, because of the proximity to
19 major metropolitan areas and the visibility of the Wild Horse site from I-90 it is
20 expected that the facility will receive more visitors than the Hopkins Ridge facility.

21
22 The advantages of the proposed change are:

- 23 • Increased workshop and storage space.
- 24 • Location near Vantage Highway provides better all weather access. Staff can
25 park private vehicles at Maintenance Facility and use site based ATVs, or 4-wheel
26 drive vehicles to traverse site gravel roads. Equipment such as a snowplow can
27 be housed at Maintenance Center and be accessible when needed, whereas at the

1 Operation Center the access road may be impassable due to snow drifts at certain
2 times.

- 3 • Parking private vehicles near the project entrance reduces the number of journeys
4 along gravel roads and minimizes the potential extent of fugitive dust and
5 gravel/mud tracked onto the public highway.
- 6 • The area near Vantage Highway has been degraded by years of public use,
7 represents minimum impact on habitat. This area was within the original study
8 area for the project and does not contain any sensitive features, such as
9 archeological finds or rare plants.
- 10 • By integrating the Informational Kiosk and Visitor Parking, some functions such
11 as blade truck turnaround and parking can overlap between the two areas thus
12 minimizing the space requirements.
- 13 • PSE can design and site the Operations Center structure in a less obtrusive way to
14 minimize the visual impact on the ridgeline. This structure will enjoy spectacular
15 views in multiple directions, a feature which PSE is anxious to preserve (refer
16 Transmission Line Re-alignment).
- 17 • A location close to Vantage Highway is advantageous for normal operations,
18 deliveries of consumables, replacement parts, packages, etc., and other functions
19 requiring public access.
- 20 • The presence of a PSE Maintenance Facility adjacent to the Information Kiosk
21 provides a degree of increased public security for that location during business
22 hours.

23
24 The change does not substantially alter the substance of the SCA or result in
25 significant detrimental effects on the environment. It changes the location of the
26 maintenance facility and better optimizes and controls the visitor use of the site. The
27 disturbed area and building footprint which will be utilized by the Operations Center

1 will remain the same as that allotted for Operation and Maintenance Facility in the
2 SCA. The Maintenance Center will require a net of three additional three acres of
3 permanently disturbed area. As stated above this area does not contain any sensitive
4 features and will have minimal impact on habitat. It should be noted that 600 acres of
5 the site was set aside as a mitigation parcel for the environmental impacts of the
6 project. The size of the mitigation parcel was far in excess of the impacts of the
7 project. increase of permanent impact caused by this amendment has been fully
8 mitigated by the size of the mitigation parcel

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10 b. Transmission Feeder Line Re-alignment

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12 A partial re-alignment of the project's 230kV Transmission Feeder Line, as shown in
13 Exhibit A, is also proposed. PSE desires to move the transmission line several
14 hundred feet away from the Operations Center, so it will not block skyline of views
15 from the facility. As originally permitted, the line passed very close to the Operations
16 Center. The concern was it would be directly in the field of view of some of the more
17 spectacular visual panoramas available from this ridge, including views of Mount
18 Rainier and Mount Hood.

19
20 The proposed re-alignment has a 1,000 foot overall shorter total length thus reducing
21 impact on the environment. For areas away from the Operations Center, the feeder
22 line will follow the previously studied and permitted alignment.

23
24 The portion of the alignment not previously surveyed was surveyed recently for
25 habitat types and historic and cultural resources. No historic or cultural resources
26 were found within the corridor. The habitats within the two corridors are comparable,
27 although their distributions are slightly different. The proposed realignment would

1 traverse approximately 86 percent medium density shrub-steppe, 9 percent
2 herbaceous, and 5 percent dense shrub-steppe compared to the original route which
3 would traverse approximately 88 percent medium density shrub-steppe and 12
4 percent herbaceous habitat. The major difference in the two routes is the shift of the
5 northern and central portions of the segment from a ridgetop and south-facing ridge
6 (in the original route) to a side slope above a drainage area (in the realigned route).
7 This shift is expected to result in a slight reduction in area of disturbance of the
8 herbaceous habitat type. This habitat typically includes lithosols, is commonly found
9 on ridges, and is known to be populated by hedgehog cactus in this locale.

10
11 The realigned route would be located on the same types of habitat as the original
12 route and would affect less area. The realigned route is expected to result in a slight
13 reduction in the area of impact on herbaceous habitat which includes lithosols. Based
14 on results of the 2003 rare plant surveys and current field review, the only state-
15 designated rare plant known to occur in the project area and realigned transmission
16 line corridor is the hedgehog cactus, a review status species. Effects to this species
17 are expected to be slightly reduced from the original proposed transmission line route,
18 due to reduced effects on lithosols. The realignment was adjusted in the field to avoid
19 additional areas of well-developed lithosols. No other rare plant species were
20 observed in the project area during the 2003 surveys, and the realigned route is
21 located primarily within areas previously surveyed. No effects to any federally listed
22 threatened, endangered, candidate or proposed species would occur as a result of this
23 realignment, as none is known or suspected to occur in the project area or on the
24 habitats within the realignment corridor.

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27 **II. Requested Council Action**

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PSE requests that the Council find that pursuant to WAC 463-66-040, the proposed amendment is consistent with: 1) the intention of the original SCA; 2) the applicable laws and rules; and 3) the public health, safety and welfare.

Further PSE requests the Council to find pursuant to WAC 463- 66-070, that the request is does not substantially alter the substance of any provision of the SCA and does not have a significant detrimental effect on the environment.

Dated this day of December, 2005

Darrel L. Peoples, WSB #885
Attorney for PSE

