



State of Washington  
**DEPARTMENT OF FISH AND WILDLIFE**

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Office of Electricity Delivery and Energy Reliability  
Room 8H-033  
U.S. Department of Energy  
1000 Independence Avenue, S.W.  
Washington, DC 20585

To Whom It May Concern:

**SUBJECT: WEST-WIDE ENERGY CORRIDOR PROGRAMMATIC ENVIRONMENTAL  
IMPACT STATEMENT (PEIS)**

The Washington Department of Fish and Wildlife (WDFW) is providing scoping comments associated with the proposed action to designate corridors in the Western States for oil, gas and hydrogen pipelines and electricity transmission and distribution facilities in the State of Washington as part of the West-Wide Energy Corridor Programmatic Environmental Impact Statement (PEIS). The WDFW has a mandate to preserve, protect, perpetuate, and manage the fish and wildlife of the state and their habitats. We believe this project has the potential to have detrimental effects on fish and wildlife and their habitats.

The goal of the WDFW mitigation policy is to achieve no loss of habitat functions and values. The type of mitigation required shall be considered and implemented in the following sequential order of preference:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the affected environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.
- Monitoring the impact and taking appropriate corrective measures to achieve the identified goal.

The greatest potential impact to fish and wildlife resources in the state from this project would be the fragmentation of fish and wildlife sensitive habitats associated with creating or expansion of existing energy corridors. One way to prevent further habitat fragmentation and to minimize costs is to site pipeline corridors along existing roads, railroads or other right-of-way. Important criteria in pipeline siting include avoiding, where possible, areas of rare habitat, areas containing threatened or endangered species, wetlands, large continuous tracts of habitat, and forested areas. Protected areas such as national parks and wildlife refuges should be avoided. Stream and river crossing should be avoided or crossed by directionally controlled horizontal drilling. We encourage the use of geographical information systems (GIS) to determine least destructive pipeline routes based on multiple criteria (Mora 1994). To protect wildlife during critical nesting and/or migration, the timing of construction activities should be coordinated with WDFW.

The “Hydraulic Code” (Chapter 77.55 RCW) requires that any person, organization, or governmental agency wishing to conduct any construction activity that will use, divert, obstruct, or change the bed or flow of state waters must do so under the terms of a permit (called the Hydraulic Project Approval – HPA) issued by WDFW. State waters include all marine waters and fresh waters of the state. An HPA would be required for conduit (pipeline) crossing in freshwater and placement of utility lines in saltwater.

The PEIS should include protection measures for any federal and state listed endangered, threatened, and sensitive species impacted by activities proposed under this impact statement. The United States Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) will need to be consulted for ESA species under their respective jurisdictions.

The Priority Habitats and Species (PHS) program is a list of species and habitats types identified by the WDFW as priorities for management and preservation. The PHS information contains mapped and digital data, which displays occurrences of important fish, wildlife and habitat types and provides management recommendations that can assist in land-use activities. We encourage the use of this information in the PEIS for identification of fish, wildlife and sensitive lands in Washington State. More information on the PHS program is available on our web site at: <http://wdfw.wa.gov/hab/phspage.htm>

The Washington Department of Ecology guidance states that when adverse wetland impacts are truly “unavoidable”, replacement ratios based on the rating of the wetland and/or type of wetland is recommended. The ratios listed below are general guidelines that are adjusted up or down based on the likelihood of success of the proposed mitigation and the expected length of time it will take to reach maturity (Department of Ecology, 1998).

<b>Wetland Category</b>	<b>Restoration</b>
Category 1 (all types)	6:1
Category 2 or 3	
• Forested	3:1
• Scrub/shrub	2:1
• Emergent	2:1
Category 4	1:25:1

The PEIS should also include a response plan for potential spills, specifically how spill response requirements will be protective of fish and wildlife resources in Washington State.

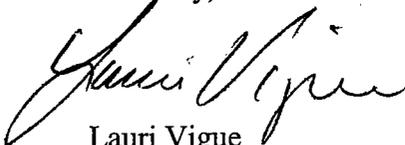
A long-term maintenance plan for management of these corridors should also be considered as part of this impact statement. Over time some parts of the pipeline or energy transmission facility may require excavation, repair, and or/replacement. These activities may impact stream, wetland and/or riparian vegetation, aquatic or terrestrial resources.

Mitigation planning activities will require long term monitoring. Because a project of this magnitude could significantly impact established habitat, and restoration is often extremely difficult, monitoring and review of the restoration of the disturbed environment and mitigation sites should be required for an extended period of time (a minimum of 10 years). Vegetation removed for construction should be replanted with native vegetation specific to the local area.

Detailed stream crossings plans and specifications should be developed for all stream crossings and wetlands impacted. Adaptation of stream crossing plans from one stream to another may not be appropriate for the protection of all streams and the water bodies into which they discharge.

Thank you for the opportunity to comment. If you have any specific questions or comments I may be reached at (360) 902-2425 or [viguelav@dfw.wa.gov](mailto:viguelav@dfw.wa.gov)

Sincerely,



Lauri Vigue  
Fish and Wildlife Biologist

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Cc: Teresa Eturaspe, WDFW

References:

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